

ENVIRONMENTAL ASSESSMENT
Greensboro Municipal Airport (7A0)
Airport Terminal Expansion
Greensboro, Hale County, Alabama

Prepared on Behalf of:

Greensboro Municipal Airport (7A0)
1618 Airport Loop Road
Greensboro, AL 36744

Prepared for:



GMC

August 5, 2026

EAXX-021-12-ARP-1756211759

In accordance with Federal Aviation Administration (FAA) Order 1050.1G §1.5(e)(4), this Environmental Assessment (EA) represents the FAA's good-faith effort to prioritize documentation of the most important considerations required by the statute within the Congressionally mandated page limits. This prioritization reflects the FAA's expert judgment. Any considerations addressed briefly or left unaddressed were, in the FAA's judgment, comparatively not of a substantive nature that meaningfully informed the consideration of environmental impacts and the resulting decision on how to proceed. This EA represents that the FAA has made a good faith effort to fulfill National Environmental Priority Act (NEPA) requirements within the Congressional timeline; that such effort is substantially complete; that, in the FAA's expert opinion, it has thoroughly considered the factors mandated by NEPA; and that, in the FAA's judgment, the analysis contained therein is adequate to inform and reasonably explain the FAA's final decision regarding the proposed Federal action.

This environmental assessment becomes a Federal Document when evaluated, signed, and dated by the responsible FAA official.

Responsible FAA Official

Date

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ACRONYMS AND ABBREVIATIONS

AAM	Advanced Acoustic Model
AC	Advisory Circular
ADEM	Alabama Department of Environmental Management
AEDT	Airport Environmental Design Tool
AHC	Alabama Historical Commission
AIP	Airport Improvement Program
AJD	Approved Jurisdictional Determination
ALP	Airport Layout Plan
ALEA	Alabama Law Enforcement Agency
ANGB	Air National Guard Base
APE	Area of Potential Effect
ATCT	Air Traffic Control Tower
BGEPA	Bald and Golden Eagle Protection Act
BLM	Bureau of Land Management
BMPs	Best Management Practices
CAA	Clean Air Act
CBMPP	Construction Best Management Practices Plan
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CRA	Cultural Resource Assessment
CWA	Clean Water Act
DNL	Day-Night Average Sound Level
DOT	Department of Transportation
EA	Environmental Assessment
EPA	Environmental Protection Agency
ESA	Endangered Species Act
ESCP	Erosion and Sediment Control Plan
FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FONSI	Finding of No Significant Impact
FPPA	Farmland Protection Policy Act
FW	Fighter Wing
MBTA	Migratory Bird Treaty Act
MGM	Montgomery Regional Airport
MLK	Martin Luther King
NAAQS	National Ambient Air Quality Standards
NAS	National Airspace System
NEPA	National Environmental Policy Act
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NPDES	National Pollutant Discharge Elimination System
NPIAS	National Plan of Integrated Airport Systems

NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NPL	National Priority List
NPS	National Park Service
NRI	Nationwide Rivers Inventory
NWI	National Wetlands Inventory
PJD	Preliminary Jurisdictional Determination
POI	Points of Interest
PSA	Primary Study Area
RCRA	Resource Conservation and Recovery Act
ROD	Record of Decision
RPZ	Runway Protection Zone
SDWA	Safe Drinking Water Act
SHPO	State Historic Preservation Office
SSA	Secondary Study Area
TAF	Terminal Area Forecast
USACE	United States Army Corps of Engineers
USDA	United States Department of Agriculture
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	Underground Storage Tank
WOTUS	Waters of the U.S.
WQC	Water Quality Certification
WSRS	National Wild and Scenic River System

CHAPTER 1 PROPOSED ACTION

1.1 Introduction

This EA has been prepared in accordance with the National Environmental Policy Act (NEPA) (42 United States Code §§ 4321-4335). Guidance for the preparation of the EA includes the Department of Transportation (DOT) Procedures for Considering Environmental Impacts (DOT Order 5160.1D), Federal Aviation Administration's (FAA's) Environmental Policy Act Implementing Procedures (FAA Order 1050.1G). The EA reviews the Proposed Action and reasonable alternatives and evaluates the potential environmental effects associated with disturbance during construction or operations once the project is complete. The city of Greensboro is currently seeking FAA funding for the proposed action.

1.2 Proposed Action

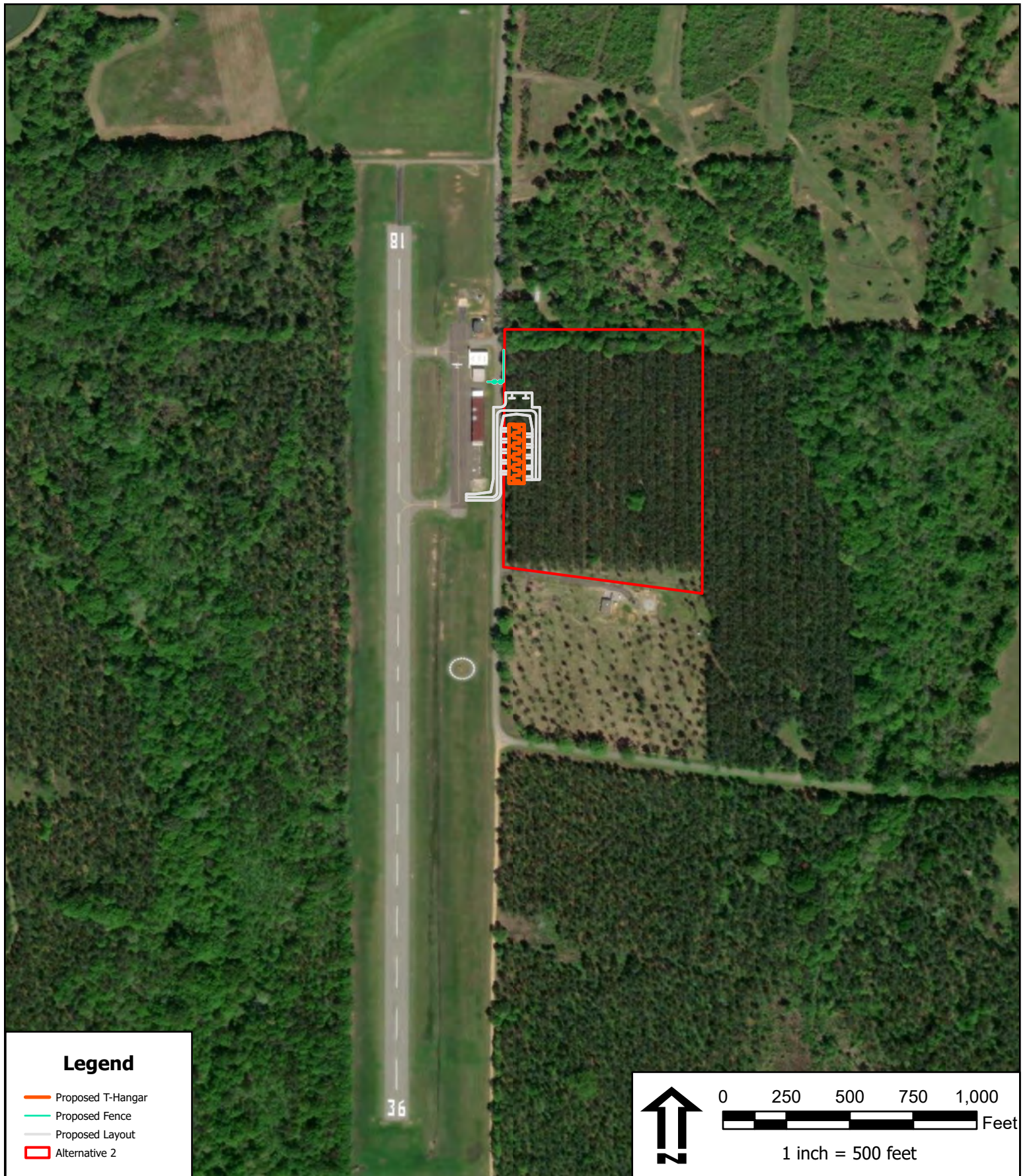
Greensboro Municipal Airport proposes to undertake several improvements to meet current FAA design guidelines as specified in AC 150/5300-13B Change 1 Airport Design. These proposed actions are outlined in the 2025 Airport Capital Improvement Plan (ACIP) and are aligned with the approved Airport Layout Plan (ALP). The development plan is a vital step for the airport in pursuing grants through the FAA's Airport Improvement Program (AIP). The improvements will enhance the airport's capacity, security, and operational efficiency.

The Proposed Action is the expansion of Greensboro Municipal Airport terminal area, including modifications to the surrounding infrastructure. This includes the construction of a new apron adjacent to the existing runway, the construction of T-Hangars, Terminal, Fuel Tank, Box Hangars, parking lot and perimeter fencing. This would enable development closer to the utilities on Millwood Road and separate the airport entrance from the other uses on the remainder of airport loop road.

This planned development was evaluated and accepted by the Greensboro Airport and is depicted on the current FAA-approved ALP. The attached figures depict the location of the project study area. **Figure 1.0** shows the location of all aspects of the proposed action. The following list includes the major components of the proposed action:

- 2025: Obstruction Removal/ New Apron Development and Design
- 2027: Clearing of the New Apron Area.
- 2028: Hangar Building Design
- 2029: Construction of the New Apron Area
- 2030: Installation of the perimeter fencing.

These milestones are designed to ensure that each phase of the project is completed in a timely and coordinated manner, with minimal disruption to airport operations and the surrounding community. By implementing necessary mitigation strategies, the airport will be able to minimize environmental impacts and proceed with the proposed action under the 2025 Airport Capital Improvement Plan.



REF. SHEET: ESRI AERIAL
DESCRIPTION: ENVIRONMENTAL ASSESSMENT

GREENSBORO MUNICIPAL AIRPORT (7A0)

GREENSBORO, HALE COUNTY, ALABAMA

FIGURE 1

Proposed Action

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CHAPTER 2 PURPOSE AND NEED

Greensboro Municipal Airport (7A0) is a public use general aviation airfield that is positioned southwest of Greensboro business district. The Airport is currently owned and managed by the City of Greensboro. Greensboro Municipal Airport is registered as a local/basic general aviation airport in the National Plan of Integrated Airport Systems (NIPAS).

Greensboro, Alabama is located in west Alabama in Hale County, 35 miles south of Tuscaloosa and 45 miles from the Alabama/Mississippi state line. Greensboro is also the county seat of Hale County and part of the Tuscaloosa, Alabama Metropolitan Statistical Area. Greensboro is situated southeast of Interstate I-59, which is a large transportation corridor that connects several major cities such as Birmingham and New Orleans. Greensboro is also located southeast of the center of Hale County and is crossed by Alabama State Routes 14, 25, and 69. State Route 14 leads northwest, 21 miles to Eutaw and 19 miles east to Marion. State Route 25 leads northeast through Talladega National Forest, 36 miles to Brent and south 32 miles to Thomaston. State Routes 69 leads north, 38 miles to Tuscaloosa and southwest, 33 miles to Linden. Demopolis is 25 miles to the southwest via State Route 69 and U.S. Route 80.

For many years, the Airport's terminal area has been situated in a way that stymies additional development. The purpose of the Proposed Action is the expansion of Greensboro Municipal Airport terminal area, including modifications to the surrounding infrastructure. Due to existing constraints related to FAA design guidelines in AC 150/5300-13B Change 1 Airport Design, particularly in terms of runway-to-parallel taxi lane separation and runway-to-parking area distances, the current terminal area is inadequate for accommodating future airport growth. The proposed project will relocate development to a newly acquired parcel of land located across Airport Loop Road to facilitate the terminal area expansion, ensuring compliance with FAA design standards and accommodating both current and future aviation demand as outlined in the Airport Layout Plan.

The existing terminal area at Greensboro Municipal Airport is unable to meet FAA design standards due to insufficient space for the required runway-to-parallel taxi lane separation and proper distance between the runway and parking areas. These deficiencies limit the airport's ability to expand and modernize in line with increasing air travel demands and the goals outlined in the Airport Layout Plan. Furthermore, the location of Airport Loop Road presents significant barriers to expansion within the current terminal area. The acquisition of land across Airport Loop Road provides the necessary space for the relocation and expansion of the terminal area to meet FAA standards and accommodate future growth. This expansion is essential for improving airport operations, enhancing safety, and supporting the region's increasing demand for air travel.

2.1 Project Need

The need for this project is due to existing constraints related to FAA design guidelines in AC 150/5300-13B Change 1 Airport Design. The existing terminal area at Greensboro Municipal Airport is unable to meet FAA design standards due to insufficient space for the required runway-to-parallel taxi lane separation and proper distance between the runway and parking areas. These deficiencies limit the airport's ability to expand and modernize in line with increasing air travel demands and the goals outlined in the Airport Layout Plan. Furthermore, the location of Airport Loop Road presents significant barriers to expansion within the current

terminal area. The acquisition of land across Airport Loop Road provides the necessary space for the relocation and expansion of the terminal area to meet FAA standards and accommodate future growth. This expansion is essential for improving airport operations, enhancing safety, and supporting the region's increasing demand for air travel, ensuring compliance with FAA design standards and accommodating both current and future aviation demand as outlined in the Airport Layout Plan.

2.2 Project Purpose

The primary purpose of the proposed action is to address deficiencies in the existing terminal area, specifically related to insufficient space for compliance with FAA design guidelines, including runway-to-parallel taxi lane separation and runway-to-parking area distances. The current terminal area cannot accommodate future growth in air travel demand, which is critical for the region's economic and operational development. The need for this expansion is driven by the growing demand for air travel, the need for safer and more efficient airport operations, and the necessity to meet FAA design standards. The Proposed Action is the first, enabling step to expand the Greensboro Municipal Airport terminal area, including modifications to the surrounding infrastructure. This first step includes the construction of a T-hangar and a taxilane. Future growth plans include the construction of a new apron adjacent to the existing runway, the construction of T-Hangars, a Terminal, relocated/upgraded Fuel Tanks, Box Hangars, a parking lot, and perimeter fencing. This would enable development closer to the utilities on Millwood Road and separate the airport entrance from the other uses on the remainder of airport loop road which would allow the airport to meet the purpose and need of current and future aviation demands, security and safety, maintenance needs, sponsor's strategic vision and FAA design standards.

CHAPTER 3 ALTERNATIVES

This section describes the capabilities and limitations of alternative ways to meet the proposed need described in Chapter 2. To remain compliant with applicable FAA regulations, the guidelines established in FAA Order 1050.1G were followed in the consideration of logical alternatives to the Proposed Action.

Per FAA Order 1050.1G, reasonable alternatives mean a reasonable range of alternatives that are technically and economically feasible, meet the purpose and need for the proposed action, and, where applicable, meet the goals of the applicant.

In addition to reasonable alternatives, the EA should also discuss the anticipated effects if "no-action" is taken. Finally, the EA should clearly identify the proposed action (Proposed Action) and provide sufficient details as to why other alternatives were eliminated. As such, alternatives that have been considered as a part of this EA process are described in detail in the following paragraphs.

3.1 Alternatives Considered

An evaluation of the existing conditions for the ALP determined the primary infrastructure component was identified as the ultimate need for a new apron/terminal area, the adjacent property was the only viable means to expand. The alternatives considered focus on defining the best location for expansion by evaluating three locations for new terminal area development. A brief description of the alternatives that have been considered is below.

Three potential project alternatives, including the “no-action” alternative, were evaluated as project development alternatives. Those alternatives include:

- Alternative 1: **No-Action Alternative:** The No-Action Alternative presents the scenario in which no action is taken.
- Alternative 2: **Proposed Action / Proposed Action:** The Proposed Action is the expansion of Greensboro Municipal Airport terminal area, including modifications to the surrounding infrastructure.
- Alternative 3: **West of Runway.** This alternative includes airport expansion in a new terminal area west of the runway 14-32.

Each of the alternatives were evaluated with respect to five criteria: 1) Does the project provide for the expansion of the airport terminal area to meet FAA design guidelines? 2) Is the project location in proximity to existing infrastructure? 3) Are there potential social impacts including property acquisitions and relocations; 4) Are there potential environmental impacts; and 5) Project costs. The alternative evaluation is summarized in the following sections.

3.2 Alternative 1: No-Action

Alternative 1: “No-Action” alternative would result in the maintaining of the status quo. The existing terminal area would continue to be utilized as is. **Figure 2.0** shows the current conditions at the airport.

Criteria Evaluation

The “No Action” Alternative/ Alternative 1 **would not meet** the purpose and need of the project, which is to expand the terminal area to meet FAA design standards and accommodate current and future aviation demands and to address the deficiencies in the current terminal area, specifically related to insufficient space for compliance with FAA design guidelines, including runway-to-parallel taxi lane separation and runway-to-parking area distances. The current terminal area cannot accommodate future growth in air travel demand, which is critical for the region's economic and operational development. The need for this expansion is driven by the growing demand for air travel, the need for safer and more efficient airport operations, and the necessity to meet FAA design standards. The No Action alternative does not address these needs. It would leave the existing terminal area unchanged, resulting in continued operational and safety limitations, preventing the airport from meeting FAA design standards and hindering the ability to handle future aviation demand as outlined in Section 2.1. See below explanation for each project criteria.

1. New Apron Area:

The No Action alternative would leave the airport facilities unable to comply with FAA design guidelines specifically runway-to-parallel taxi lane separation and runway-to-parking area distances. Also, the current terminal area cannot accommodate future growth in air travel demand.

A no action would allow Airport Loop Road to remain open to the public and this could result in possible disruptions to airport operations as the demand for flights grows overtime.

2. Proximity to Existing Infrastructure:

The No Action alternative would leave the airport in a non-compliant state with respect to FAA design standards. The insufficient separation between runways, taxi lanes, and parking areas could create safety risks, including potential conflicts between aircraft and ground operations.

3. Social Impacts:

The inability to expand the terminal and surrounding infrastructure on property currently owned by the airport could keep the airport in non-compliance in regard to FAA design guidelines specifically runway-to-parallel taxi lane separation and runway-to-parking area distances. A no action would allow Airport Loop Road to remain open to the public; this could result in possible disruptions to airport operations as the demand for flights grows overtime.

4. Environmental Impacts

Since the “No-Action” alternative does not include completion of any of the proposed project activities, there are no potential environmental impacts.

5. Project Cost

There is no project costs related to the “No-Action” alternative.

The “No Action” alternative would not meet the purpose and need of the project, which is to expand the terminal area to meet FAA design standards and accommodate current and future aviation demands and to address the deficiencies in the current terminal area, specifically related to insufficient space for compliance with FAA design guidelines, including runway-to-parallel taxi lane separation and runway-to-parking area distances. The selection of the “No-Action” alternative would result in no costs and would have no social or environmental impacts to the surrounding communities or environment. The Airport would not be able to provide expand due to growing demand for air travel, provide a safer and more efficient airport facility, and meet FAA design standards.

3.3 Alternative 2: Proposed Action

The preferred action is located east from the existing terminal area, the new apron area includes the construction of T-Hangars, Terminal, Fuel Tank, Box Hangars, parking lot and perimeter fencing at the Greensboro Municipal Airport. This area would require Airport Loop Road to be dead ended into the new terminal. This would enable development closer to the utilities on Millwood Road and separate the airport entrance from other uses on the remainder of Airport Loop Road which is essential for improving airport operations, enhancing safety, and supporting the region's increasing demand for air travel. This planned

development was evaluated and accepted by Greensboro Airport and is depicted on the current FAA-approved ALP. **Figure 3.0** depicts the proposed Alternative 2 activities.

Criteria Evaluation

Alternative 2 (Proposed Action) **would meet** the outlined project criteria while minimizing social and environmental impacts. See below explanation for each of the project criteria.

1. new apron area

This alternative includes the construction of a new apron adjacent to the existing runway, this includes the construction of T-Hangars, Terminal, Fuel Tank, Box Hangars, parking lot and perimeter fencing. This would enable development closer to the utilities on Millwood Road and separate the airport entrance from the other uses on the remainder of airport loop road. Most importantly this alternative would meet FAA design standards.

2. Proximity to existing infrastructure

The potential for future development is limited to the proposed area location east of the airport. This alternative is located on previously cleared property and enables development closer to utilities on Millwood Road preventing unnecessary construction for additional utilities.

3. Social impacts

This alternative would utilize property that is owned by the airport and would not require the acquisition of additional property. This alternative would require Airport Loop Road to be dead ended into the new terminal; this would enable development closer to the utilities on Millwood Road and separate the airport entrance from other uses on Airport Loop Road. This closure on Airport Loop Road adjacent to the airport would prevent a resident from accessing their residence from the north on airport loop road. Instead, this resident would be required to access their driveway from the south on airport loop road, this alternative route would not require the resident's driveway from being relocated. There would be no relocation of residences, or businesses; therefore, no significant social impacts are anticipated due to the implementation of this alternative.

4. Environmental Impacts

Environmentally, this alternative reduces cost by placing development as far away as possible from known environmentally sensitive areas. There are no streams or wetlands located on the proposed Alternative 2 location. Also, this location does not support suitable or sufficient foraging, breeding, nesting or refugia habitats for any of the federally-listed threatened or endangered wildlife species.

5. Project Cost

The total project cost for Alternative 2 is estimated at \$1,818,290.00. The estimate includes projected costs for construction.

3.4 Alternative 3: West of Runway

Alternative 3 includes airport expansion in a new terminal area west of the runway 14-32. However, this area has a blue-line stream nearby as well as a FEMA Flood zone that encroaches closer than either location 1 or location 2. Furthermore, there is no existing vehicle access to this area, all access roads would cross through

the flood zone area thus raising the infrastructure cost, as well as preventing airport access in an extreme flood scenario. It was determined, due to the significant physical cost and environmental impact this alternative was least appealing for the airport expansion. **Figure 4.0** shows Alternative 3, showing several blue line streams impacted which would raise infrastructure cost as well as parcels that would need to be acquired as part of the development.

Criteria Evaluation

Alternative 3: This alternative includes airport expansion in a new terminal area west of the runway 14-32. The construction of a new terminal area west of the runway 14-32 **would meet** project criteria #1; however, this alternative layout increases the potential for social and environmental impacts and has a higher total project cost. See below explanation for each of the project criteria.

1. new apron area

This alternative includes airport expansion in a new terminal area west of the runway 14-32. This alternative would meet FAA design standards.

2. Proximity to existing infrastructure

This alternative is not practical or viable in terms of cost; it does not utilize existing infrastructure and there are no existing vehicle access roads or existing utilities. Construction of new access roads and utilities would increase project costs.

3. Social impacts

According to the Hale County tax records, the property located at this alternative is not owned by the airport. This property would need to be purchased by the airport in order to complete this project at this location. This alternative could result in potential social impacts by requiring the relocation of residences.

4. Environmental Impacts

Environmentally, this alternative is located within an area consisting of several blue-line streams nearby as well as a FEMA Flood zone that encroaches this area- limiting future development without significant mitigation costs to the Airport and the FAA/ALDOT. There is no existing vehicle access to this area, all access roads would cross through the flood zone area, disturbing streams and wetlands, thus raising the infrastructure cost in addition to the costs associated with airfield development. Developing the terminal area near the FEMA Flood Zone would also prevent airport access in an extreme flood scenario. It was determined; due to the significant physical cost and environmental impact this alternative was least appealing for the airport expansion.

5. Project Cost

The total project cost for Alternative 2 is estimated at \$3,437,620.00. The estimate includes projected costs for infrastructure construction, wetland/stream mitigation costs and property acquisition. According to the Hale County tax records, the property west of the airport is not owned by the airport. This property would need to be purchased by the airport to complete this project.

3.5 Proposed Action Selection

In summary, Alternative 2 and 3 would meet the project purpose by providing an airport expansion in a new terminal area meeting FAA design standard. Alternative 1 would not address the deficiencies in the current terminal area, specifically related to insufficient space for compliance with FAA design guidelines and Alternative 3 would have significant environmental impacts due to the construction of utilities and access roads thus creating stream and wetland disturbances which would raise infrastructure cost. Additionally, alternative 3 would require land acquisition which would increase project cost. Alternative 2; therefore, has no environmental impacts, utilizes property that is entirely owned by the Airport and would enable development closer to the utilities on Millwood Road which would reduce costs while still meeting the project goals. Alternative 3 would have much greater project costs than Alternative 2, therefore, Alternative 2, is selected as the Proposed Action for the new apron area at the Greensboro Airport. Table 1.0 below briefly summarizes the project criteria evaluated for each alternative. Due to the substantial impacts described above, Alternative 3 has not been carried forward for further review in this EA.

Table 1.0 below briefly summarizes the project criteria evaluated for each alternative			
Project Criteria	Alternative 1 (No-Action)	Alternative 2 (Preferred)	Alternative 3
New Apron Area	No	Yes	Yes
Proximity to existing infrastructure	Yes	Yes	No
Potential Social Impacts	None	Property currently owned by the City of Greensboro close proximity to utilities on Millwood Road	Property Acquisition
Potential Environmental Impacts	None	This property has of an approved Jurisdictional Determination from the USACE	Stream and Wetland mitigation and Infrastructure required.
Project Cost	None	\$1,818,290.00	\$3,437,620.00



Legend

Alternative 2

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GREENSBORO, HALE COUNTY, ALABAMA

FIGURE 2

No Action

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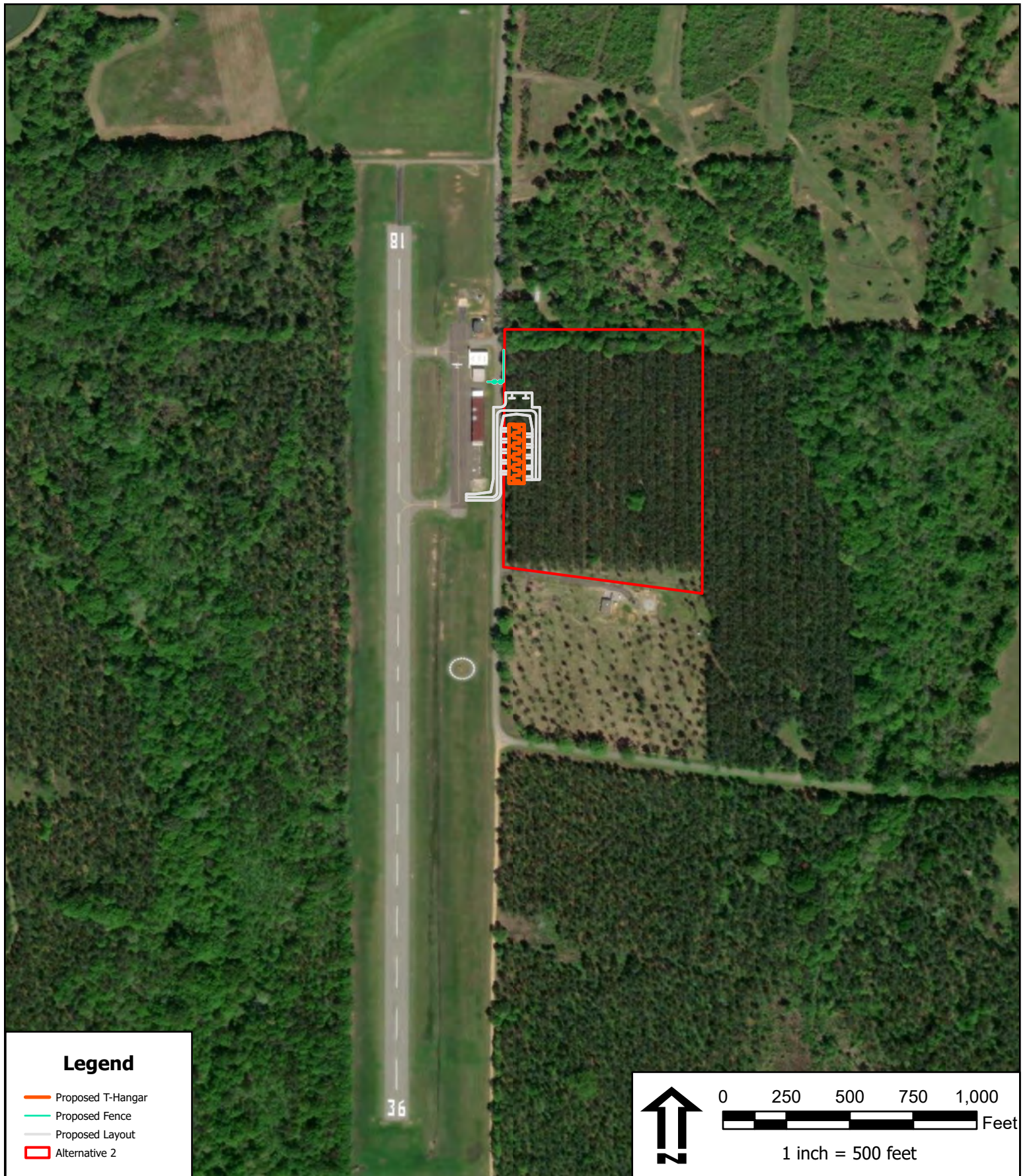
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GREENSBORO, HALE COUNTY, ALABAMA

FIGURE 3

Proposed Action

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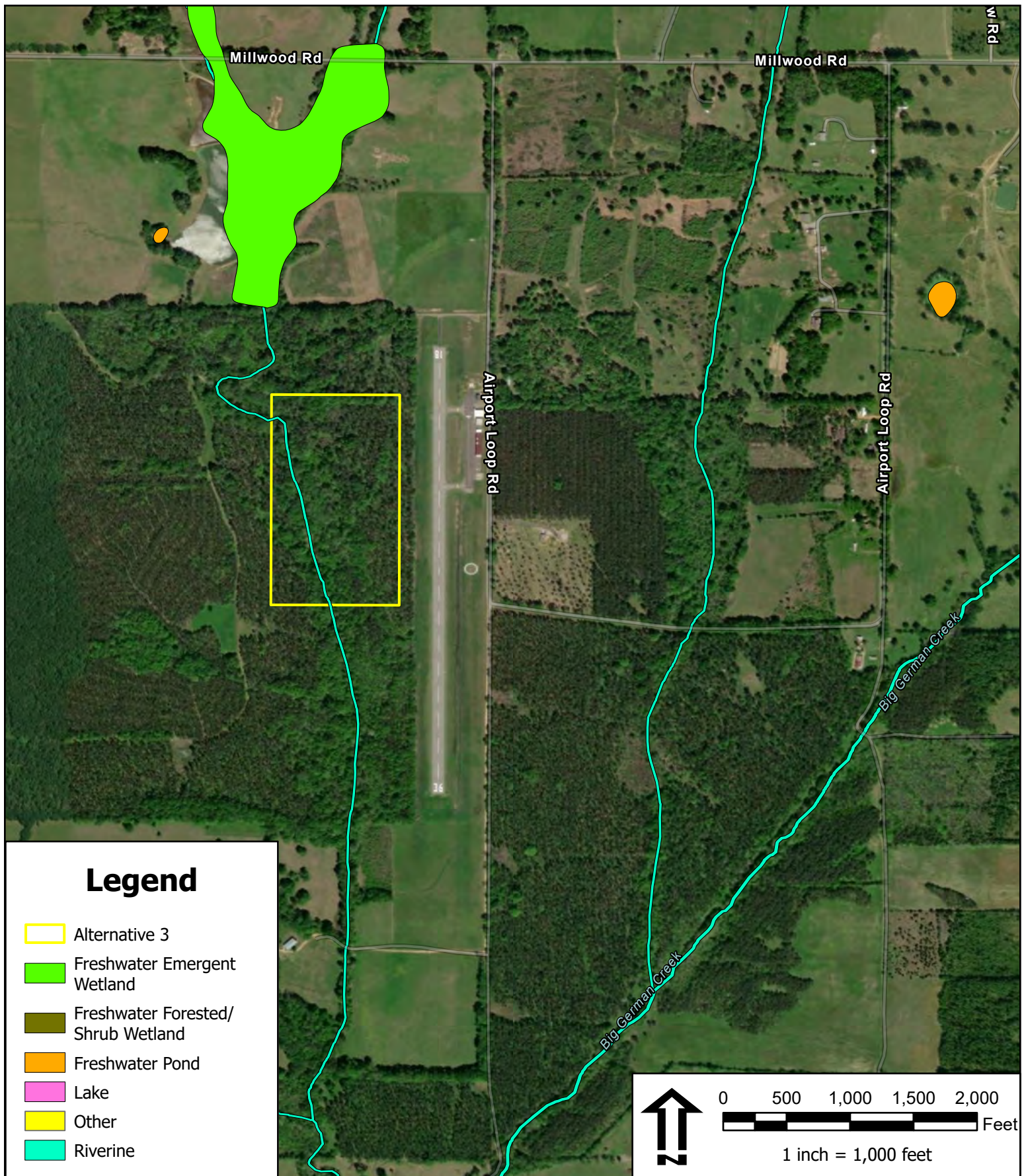
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REF. SHEET: NATIONAL WETLAND INVENTORY
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GREENSBORO MUNICIPAL AIRPORT (7A0)

GREENSBORO, HALE COUNTY, ALABAMA

FIGURE 4

ALTERNATIVE MAP

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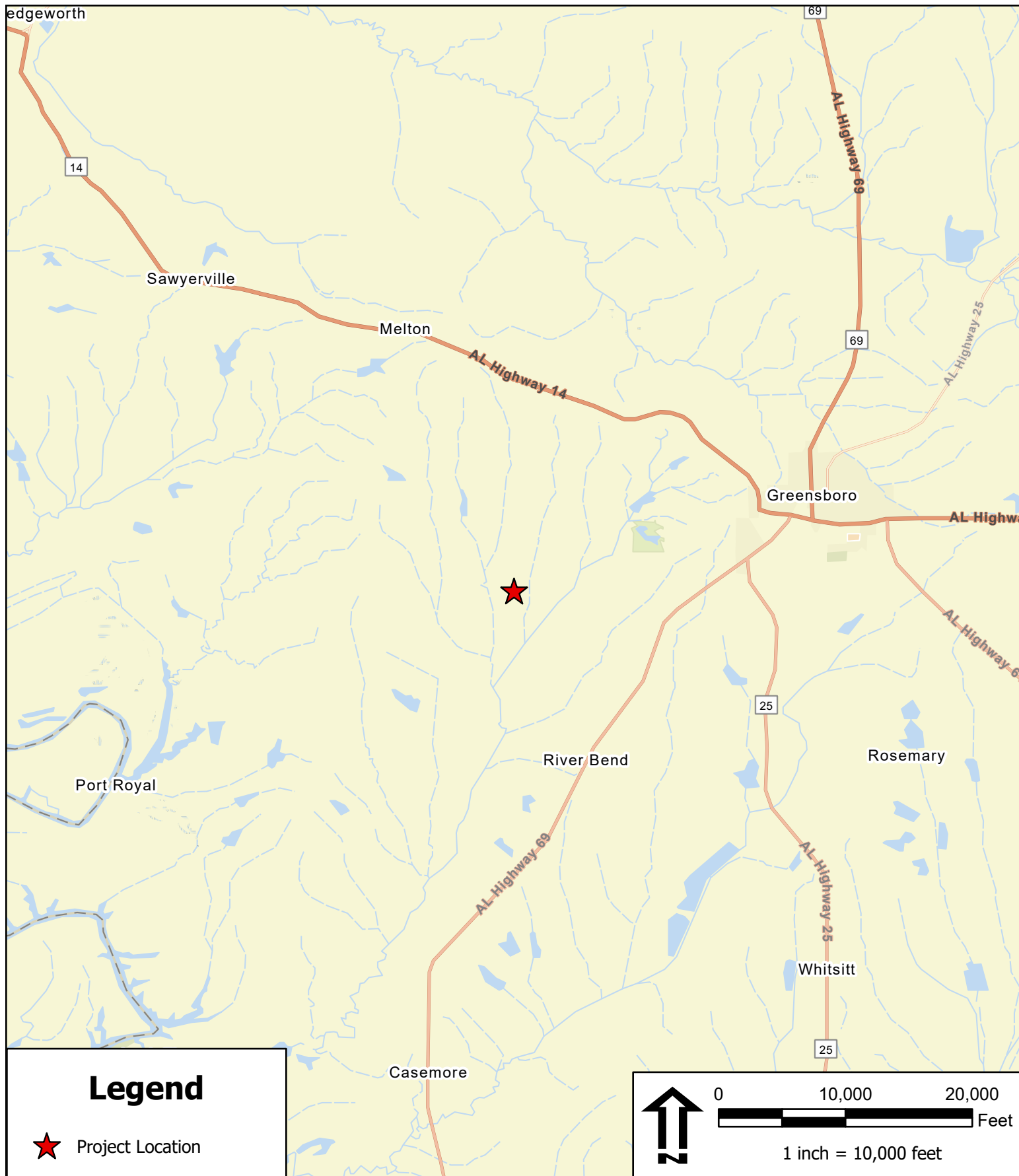
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GREENSBORO MUNICIPAL AIRPORT (7A0)

GREENSBORO, HALE COUNTY, ALABAMA

FIGURE 5

LOCATION MAP

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CHAPTER 4 AFFECTED ENVIRONMENT

The purpose of this chapter is to “succinctly describe the environmental conditions of the potentially affected geographical area” of the proposed action, as stated within FAA Order 1050.1G.

FAA Order 1050.1G provides thirteen (13) environmental resource categories to be assessed and, where established, provides for each an appraisal threshold for potential impacts. Construction and secondary (induced) impacts that may be generated are addressed within each. The categories for assessment are:

- Aviation Emissions and Air Quality
- Biological Resources
- Department of Transportation Act, Section 4(f) and Land and Water Conservation Fund, Section 6(f)
- Farmlands
- Hazardous Materials, Solid Waste, and Pollution Prevention
- Historical, Architectural, Archeological, and Cultural Resources
- Land Use
- Natural Resources and Energy Supply
- Noise and Noise-Compatible Land Use
- Socioeconomics, and Children’s Environmental Health and Safety Risks
- Visual Effects
- Water Resources
- Coastal Resources

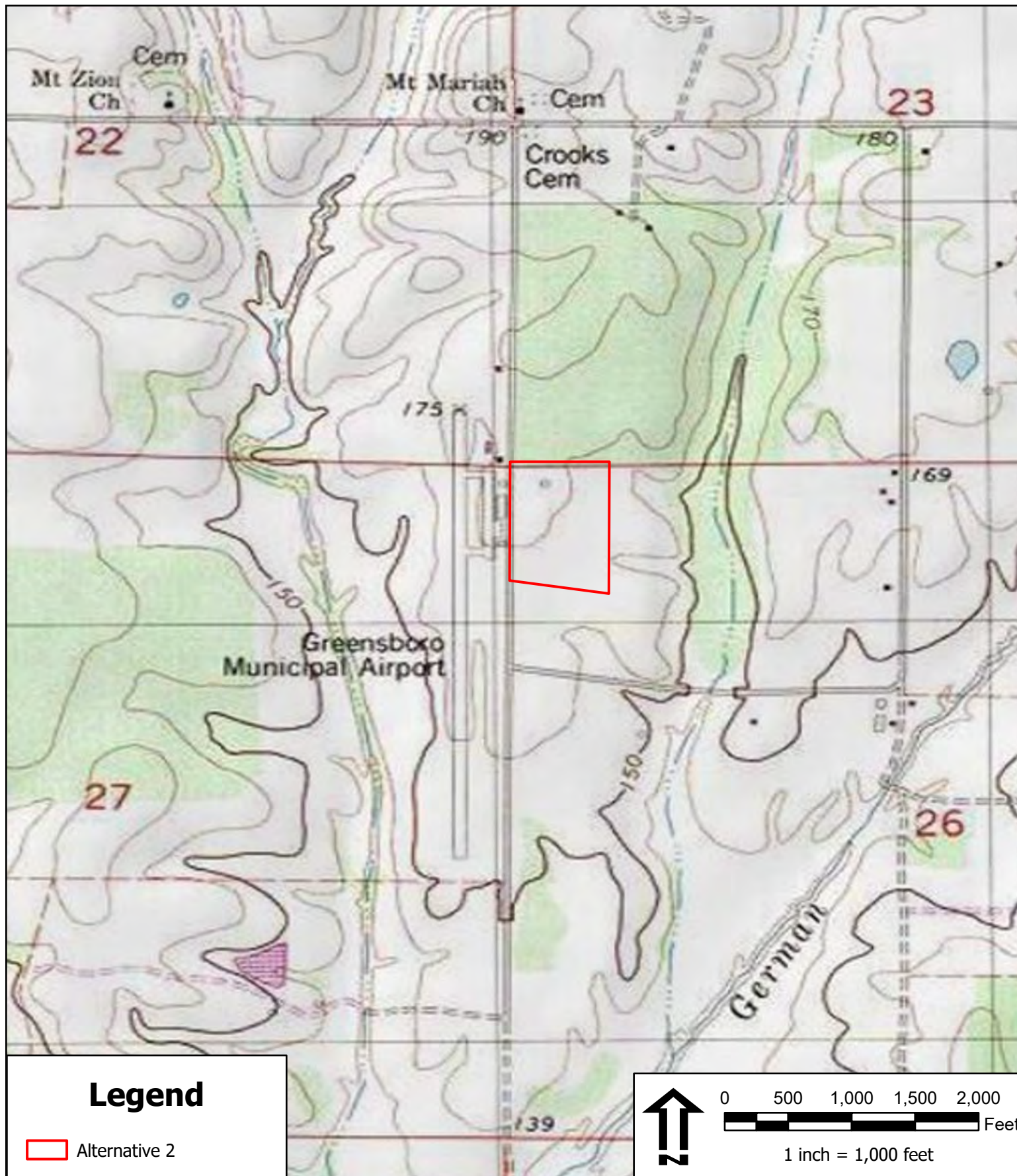
The FAA Order 1050.1G gives details on the type and scale of analysis to be performed for each suspected impact category. These reference materials were applied in describing the affected environment and the possible impacts that may be generated by implementation of the Proposed Action. From this guidance, there are ten (10) environmental resource categories listed that could be present within the geographical area of the Proposed Action or reasonable alternatives. These categories are further addressed in Chapter 5.

4.1 General Project Setting

Greensboro Municipal Airport (7A0) is a public use general aviation airport that is positioned at approximately 3NM southwest of Greensboro’ business district. The airport is currently owned and managed by the City of Greensboro. The Greensboro Municipal Airport is registered as a local/basis general aviation airport in the National Plan of Integrated Airport Systems (NIPAS). Greensboro, Alabama is located in Hale County, south of Tuscaloosa County in West Alabama in Hale County (**Figure 5.0 General Location Map**). The Airport property is directly surrounded by undeveloped land, rural residential and commercial properties. Greensboro is southeast of the center of Hale County and is crossed by Alabama State Routes 14, 25 and 69. The airport and associated project area is approximately 150 – 174 feet above sea level (ASL) and is situated within the East Gulf Coastal Plain physiographic province of Alabama. The airport is further described as being located within the Black Prairie District of the East Gulf Coastal Plain physiographic section. The Black Prairie District, named for black soil that is common in the area, is a gently to moderately rolling prairie that is characterized by extensive grasslands, but very few trees. Surface water runoff at the airport generally flows southeast towards Big German Creek. The Airport is located within the Lower Black Warrior Watershed (HUC 03160113) (**Figure 6.0 USGS Quadrangle Map**).

For the purpose of this EA, two study areas have been defined. The primary study area (PSA) is approximately 14-acres and is the area that was determined to potentially experience direct physical disturbance during the construction and operation of the proposed action. Some resource categories could have the potential to create impacts outside of the primary study area (i.e., noise, air, and land use); therefore, the secondary study area (SSA) includes areas where both direct and indirect impacts may occur as a result of the proposed project.

The PSA area is located on the east side of Airport Loop Road and is also located east of the current terminal building and self-serve fuel farm. The PSA has been previously clear cut and is currently a natural regenerating pine forested area. The PSA is not located within a floodplain and does not have any archeological sites located within the direct project area. The secondary study area is located west of Runway 14-32. This area contains several blue-line streams and is within a FEMA flood zone. Building infrastructure within this area raises infrastructure cost and prevents airport access in an extreme flood scenario.



REF. SHEET: 1980 MELTON, AL QUADRANGLE
DESCRIPTION: ENVIRONMENTAL ASSESSMENT

GREENSBORO MUNICIPAL AIRPORT (7A0)

GREENSBORO, HALE COUNTY, ALABAMA

FIGURE 6

USGS QUADRANGLE MAP

GMC #EMGM250010

DATE: 7/15/2025

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4.2 Non-Applicable Environmental Impact Categories

The following is a list of resources that the No-Action and/or the Proposed Action would not affect as they are not present within or near to the study area:

4.2.1 Sections 4(f) and 6(f)

Section 4(f) properties include parks and recreational areas, wildlife and waterfowl refuges, and historic sites of national, state, or local significance that are both publicly owned and open to the public. A property must be a significant resource for Section 4(f) to apply. It protects only those historic or archeological properties that are listed (or eligible) on the National Register of Historic Places (NRHP), except in unusual circumstances. Historic sites are normally identified during the process required under Section 106 of the National Historic Preservation Act (NHPA). Any part of Section 4(f) property is presumed to be applicable unless there is a statement of insignificance relative to the entire property by the office having jurisdiction over the property. There are no 4(f) properties located within or in close proximity to the PSA. Therefore, the proposed activities will not affect 4(f) properties.

Section 6(f) provides funds for buying or developing public use recreational lands through grants to local and state governments. Section 6(f)(3) prevents conversion of lands purchased or developed with Land and Water Conservation Fund Act funds to non-recreation uses, unless the Secretary of the Department of the Interior (DOI), through the National Park Service (NPS), approves the conversion. A project that would use Section 4(f) parks or recreation areas must also comply with Section 6(f) of the Land and Water Conservation Fund, 16 U.S.C. § 4601-8(f), if the property was acquired or developed with financial assistance under the Land and Water Conservation Fund State Assistance Program. There are no Section 6(f) resources associated with the proposed project. Therefore, the proposed activities will not affect 6(f) properties.

4.2.2 Natural Resources and Energy Supply

This impact category evaluates the consumption of natural resources and use of energy supplies that may result from the Proposed Action and alternatives. Natural resources can include water, asphalt, aggregate, wood, and other raw materials. Energy supplies include coal, natural gas, and other fossil fuels. The assessment herein includes consideration for all phases of the Proposed Action including construction, regular use, and maintenance. The Proposed Action and alternatives are anticipated to use common construction materials that are in regular supply within Hale County. These include natural resource materials, and commodity materials, that are typical in construction of apron areas such as clay, concrete, gravel, and asphalt. Vehicle fuels to power routine construction equipment during the construction phase of the project would also be needed. Sources for such fuel are available in Greensboro. The evaluated alternatives would not require the use of scarce or unusual materials or natural resources and only a temporary increase in energy supply, primarily fuel consumption during construction, would occur. It is not anticipated that this temporary increase in demand during construction would have the potential to cause demand to exceed available or future supplies of this resource. Therefore, the proposed action and alternatives would have no effect on natural resources and energy supply.

4.2.3 Coastal Resources

Hale County is not located within the Coastal Barrier Resource System as defined by the Department of the Interior (DOI) under The Coastal Barrier Resources Act of 1982. Similarly, the Coastal Zone Management Act of 1972, as administered by the National Oceanic and Atmospheric Administration (NOAA), and the NOAA National Marine Sanctuaries Act, are not applicable to the water resources of Hale County, Alabama. Therefore, coastal resources are not relevant to this assessment.

4.3 Suspected Environmental Impact Categories

The environmental resource categories listed below are, or may be, present within the geographical area of the Proposed Action or any reasonable alternatives. This determination was made after consulting with applicable regulatory agencies and after thorough investigations of the study areas. These categories, the potential for significant impact, and any required mitigation, are further discussed in the following chapter.

- Aviation Emissions and Air Quality
- Biological Resources
- Farmlands
- Hazardous Materials, Solid Waste, and Pollution Prevention
- Land Use
- Noise and Noise-Compatible Land Use
- Socioeconomics, and Children's Environmental Health and Safety Risks
- Visual Effects
- Water Resources
- Historical, Architectural, Archeological, and Cultural Resources

CHAPTER 5 ENVIRONMENTAL CONSEQUENCES & MITIGATION

In accordance with FAA Order 1050.1G, this section of the EA provides detailed information on the analysis and evaluation of potential environmental impacts associated with the Proposed Action compared to the No-Action alternative. It also provides information on the applicable regulatory settings, and the special purpose laws, if any, associated with each impact category.

The FAA has established significance thresholds for most, but not all environmental categories, and has identified the thresholds in FAA Order 1050.1G. **Table 2.0** provides a summary listing of the suspected environmental impact categories in Chapter 4 along with identification of whether or not potential impacts beyond FAA significance thresholds (if established) are anticipated.

TABLE 2.0: PROPOSED ACTION POTENTIAL IMPACTS BEYOND SIGNIFICANT THRESHOLD

Environmental Impact Category	Potential Impact?
Air Quality	No
Biological Resources	No
Farmland	No
Hazardous Materials, Solid Waste, and Pollution Prevention	No
Historic, Architectural, and Archeological Resources	No
Land Use	No
Socioeconomics and Children's Environmental Health and Safety Risks	No
Noise and Noise-Compatible Land Use	No
Visual Effects	No
Water Resources	No

**No significant threshold has been established by FAA; however, impacts are anticipated, and mitigation actions are proposed.*

The sections below describe the regulatory setting, significance thresholds (if thresholds have been set), and environmental consequences of each resource that the Proposed Action and No-Action alternative may potentially affect. If an alternative evaluated in this section would result in significant environmental impacts, mitigation measures to address such impacts are also discussed. Mitigation measures as defined by 40 CFR include steps to avoid, mitigate, minimize, rectify, reduce, or eliminate the impact associated with a proposed agency action. The objective of mitigation is to control disturbance of the environment, including the individuals, and habitat that live in the environment. As detailed in Chapter 4, resource categories Coastal Resources; Department of Transportation Act, Section 4(f); Land and Water Conservation Fund, Section 6(f); and Natural Resources and Energy Supply are not relevant to the proposed action and alternatives. No further analysis of these is required and, therefore, are not included in this chapter.

5.1 Aviation Emissions and Air Quality

The affected environment for air quality has been determined to not only include the PSA but also the area immediately adjacent to the proposed project footprint. Impacts to air quality must be considered under both the Clean Air Act (CAA) and NEPA, as a part of FAA requirements. Air quality assessments are required for any Proposed Action receiving federal funding.

5.1.1 Regulatory Setting

Air quality is monitored by the United States Environmental Protection Agency (EPA) and is enforced under provisions of the Clean Air Act (CAA). The EPA has a classification system to designate areas throughout the United States according to the level of pollution in the air. These areas are known as attainment and non-attainment areas. Non-attainment is an area that does not meet one or more of the National Ambient Air Quality Standards (NAAQS) for the criteria pollutants designated in the CAA. An attainment area is considered to have air quality as good as or better than the national ambient air quality standards as defined in the Clean Air Act. These standards monitor for six common air pollutants: carbon monoxide (CO), nitrogen dioxide (NO₂), ground-level ozone (O₃), particulate matter (PM), sulfur dioxide (SO₂), and lead (Pb). These pollutants may cause harm and negative effects to human and environmental health, in certain concentrations. The EPA regulates these pollutants and gives official designation for areas throughout the nation as either meeting (i.e. "in attainment") or not meeting (i.e. "nonattainment") these regulatory standards.

5.1.2 Significant Impact Threshold

Identified in FAA Order 1050.1G, the significance threshold for air quality is defined as *"The action would cause pollutant concentrations to exceed one or more of the National Ambient Air Quality Standards (NAAQS), as established by the Environmental Protection Agency under the Clean Air Act, for any of the time periods analyzed, or to increase the frequency or severity of any such existing violations."*

5.1.3 Affected Environment / Analysis

The proposed project site is located in Hale County, AL, which currently meets all NAAQS of the CAA criteria pollutants listed above. Additionally, a significant increase in airport operations is not anticipated as a result of the implementation of the proposed action.

5.1.4 Environmental Consequences of Alternatives

5.1.4a Alternative 1: No-Action

The No-Action alternative would result in no new construction of an apron, T-Hangars, Terminal, Fuel Tank, Box Hangars, parking lot and perimeter fencing adjacent to the existing runway. This alternative would leave air quality unchanged from the existing condition. As such, the No-Action alternative would not result in direct, indirect or reasonably foreseeable effects to air quality. No further analysis would be necessary and mitigation efforts would not be required.

5.1.4b Alternative 2: Proposed Action

During the construction phase, impacts such as a reduction to the local air quality can be caused by fugitive dust or emissions from heavy equipment at the project site. As a way to mitigate this impact, the contractor will implement routine dust control measures that could include periodic watering of the project site during dry conditions, providing a designated haul route that will minimize soil being carried onto the adjacent road network, and the discontinuance of all construction activities during exceptionally dry and/or high wind conditions. No other reasonably foreseeable effects to air quality would result as part of the Proposed Action.

5.2 Biological Resources

Biological Resources are described by the Desk Reference as “being valued for their intrinsic, aesthetic, economic, and recreational qualities.” This impact category includes an assessment of presence or use of the proposed study area by terrestrial and aquatic plant and animal species. Such species include state or federally-listed threatened and endangered species, species of special concern, migratory birds, game species, and environmentally sensitive and/or critical habitats. Any potential impacts to biological resources that may result from changes to visual effects or negative effects of light emissions should also be discussed in this section.

5.2.1 Regulatory Setting

The FAA Desk Reference identifies the various statutes, Executive Orders, and other guidance federally adopted in order to protect biological resources. Though many regulations are listed, the ones most applicable to the Proposed Action for this EA include the Bald and Golden Eagle Protection Act (BGEPA), the Endangered Species Act (ESA), and the Migratory Bird Treaty Act (MBTA). The United States Fish and Wildlife Service (USFWS) holds regulatory oversight of these programs on the federal level.

5.2.2 Significant Impact Threshold

In accordance with FAA Order 1050.1G, a significant impact would occur if the USFWS determines that the Proposed Action would be likely to jeopardize the existence of federally-listed threatened or endangered species or would result in adverse impacts to federally-designated critical habitat. The FAA has not established a significance threshold for non-listed species. In addition, Exhibit A-1 of FAA Order 1050.1G provides other factors to consider in evaluating potential for impacts to biotic resources. These include, but are not limited to, extirpation of an unlisted species from a large area, adverse impacts to special status species or their habitats, substantial loss or degradation of native species or their habitats, or adverse impacts to reproductive success / ability to sustain viable species populations.

5.2.3 Affected Environment / Analysis

As the Proposed Action includes new construction of an apron, T-Hangars, Terminal, Fuel Tank, Box Hangars, parking lot and perimeter fencing adjacent to the existing runway onto currently undeveloped land, the project could potentially involve the development of critical habitat or habitat that is being utilized by one or more of the biological resources listed below. Therefore, this

section discusses the existing vegetation composition, and any federally-listed threatened or endangered species, species of special concern, migratory birds, and state protected species known to occur, or have the potential to utilize, the PSA. **Table 3.0** provides a summary of the thresholds and factors to consider when performing an analysis of impacts to this category, as described in Exhibit A-1 of the FAA Order 1050.1G.

TABLE 3.0: SUMMARY OF BIOTIC RESOURCE ANALYSIS – FACTORS TO CONSIDER

FAA Threshold or Factor	Potential Effect by Proposed Action?
Threshold: USFWS determined the action jeopardizes existence of a federally-listed threatened or endangered species or destruction/adverse modification to designated critical habitat	No. The USFWS sent a 'Stamp Reply' of concurrence on May 02, 2025 indicating that no federally-listed species/critical habitat are known to occur in the project area.
Factor: A long-term or permanent loss of unlisted plant or wildlife species, i.e., extirpation of the species from a large project area	No. The habitats noted within the PSA are common within the surrounding area. Supporting populations of similar species are also common in the surrounding area.
Factor: Adverse impacts to special status species (e.g., state species of concern, species proposed for listing, migratory birds, bald / golden eagles) or their habitats.	No. The habitats noted within the PSA are common within the surrounding area. Supporting populations of similar species noted within the PSA are also common in the surrounding area.
Factor: Substantial loss, reduction, degradation, disturbance, or fragmentation of native species' habitats or their populations	No. The habitats noted within the PSA are common within the surrounding area. Supporting populations of similar species are also common in the surrounding area.
Factor: Adverse impacts on a species' reproductive success rates, natural mortality rates, non-natural mortality (e.g., road kills and hunting), or ability to sustain the minimum population levels required for population maintenance.	No. The habitats noted within the PSA are common within the surrounding area. Supporting populations of similar species noted within the PSA are also common in the surrounding area.

Source: Significance Thresholds and factors to consider established in FAA Order 1050.1G

The USFWS Information for Planning and Consultation (IPaC) database was utilized to generate a list of threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the PSA and/or may be affected by the proposed project. The IPaC generated species list is attached as **Appendix A. Table 4.0** below identifies the listed species that were identified. No critical habitats were identified within the PSA.

TABLE 4.0: USFWS THREATENED AND ENDANGERED SPECIES LIST

Common Name	Scientific Name	Federal Status
Tricolored Bat	<i>Perimyotis subflavus</i>	Proposed Endangered
Alligator Snapping Turtle	<i>Cryptobranchus alleganiensis</i>	Proposed Threatened
Inflated Heelsplitter	<i>Potamilus inflatus</i>	Threatened
Monarch Butterfly	<i>Danaus plexippus</i>	Proposed Threatened

Vegetation

This subsection will provide a description of vegetation and habitats within the PSA that may provide support for terrestrial and aquatic plants and animals. The Proposed Action PSA consists of undeveloped areas mostly consisting of a natural pine regenerated forested areas. The developed areas surrounding the PSA consist of the existing apron area. The areas surrounding the apron area consist of regularly mowed grassy areas. According to the attached AJD no jurisdictional water resources will be impacted.

Upland habitats within the study area include portions of the existing airport facility that are dominated by grasses that are regularly mowed as part of airfield management. Other upland areas consist of pastureland and mixed hardwood/pine forested areas. Plant species observed within the upland areas include facultative, facultative upland, and upland species that are common for the region. A few of these species include various forage grasses, *Rubus* sp., broom sedge (*Andropogon virginicus*), loblolly pine (*Pinus taeda*), red maple (*Acer rubrum*), and American elm (*Ulmus americana*).

No state or federally-listed protected plant species, as described in **Table 4.0**, were documented within, or adjacent to, the study area. Moreover, the PSA does not contain suitable habitat to support potential state or federally-listed plant species known to occur within the surrounding area.

Protected Wildlife Species

Wildlife species of concern that may occur within, or near to, the PSA are identified in **Table 4.0**. There is no evidence that the PSA or surrounding areas of the airport are utilized by any of the federally listed threatened or endangered wildlife species. Additionally, no environmentally sensitive or critical habitat are located within the PSA.

Certain species of birds that are common at airports and also protected under the Migratory Bird Treaty Act (MBTA), such as American crows (*Corvus branchyrhynchos*), killdeer (*Charadrius vociferus*), mourning doves (*Zenaida macroura*), and eastern meadowlarks (*Sturnella magna*),

may occasionally use the grassy areas within the PSA and surrounding airfield for ground foraging. Common terrestrial species, protected as game animals by the State of Alabama, which may occur within the PSA include Virginia opossum, raccoon, white-tailed deer, North American beaver, coyote, and eastern wild turkey. These are very common species found throughout the surrounding area.

A preliminary scoping letter discussing the project and its potential impacts to biological resources was submitted to the USFWS. The USFWS responded with a stamped-reply on May 02, 2025, stating no federally listed species or critical habitat are known to occur in the project area and this project will have no significant impact on fish and wildlife resources. Coordination with the U.S. Army Corps of Engineers (USACE) for a jurisdictional wetland's determination was recommended, as well as the use of best management practices specific to the project. A copy of the USFWS stamped reply and approved Jurisdictional Determination letter can be found in **Appendix D**.

Environmentally Sensitive and Critical Habitats

There is no federally-listed critical habitat areas designated within the vicinity of the PSA.

5.2.4 Environmental Consequences of the Alternatives

5.2.4a Alternative 1: No-Action

Vegetation

The No-Action alternative would not affect the vegetative communities, and the associated wildlife use of such communities, beyond the existing condition. The PSA would continue to be undeveloped land. No reasonably foreseeable effects to vegetation would result as part of the No-Action alternative. No further analysis would be necessary and mitigation efforts would not be required.

Wildlife

The No-Action alternative would not affect the wildlife, including protected wildlife species, within the PSA or surrounding area. The area would continue to be undeveloped land. No reasonably foreseeable effects to wildlife would result as part of the No-Action alternative. No further analysis would be necessary and mitigation efforts would not be required.

Environmentally Sensitive and Critical Habitats

There are no federally-listed or state designated critical habitat areas within the PSA or immediate surrounding areas. No reasonably foreseeable effects would result to environmentally sensitive and critical habitats as part of the No-Action alternative. No further analysis would be necessary and mitigation efforts would not be required.

5.2.4b Proposed Action (Alternative 2)

Vegetation

The Proposed Action would convert approximately 14 acres of undeveloped land to impervious surfaces in the form of asphalt associated with the new apron, T-Hangars, Terminal, Fuel Tank, Box Hangars, parking lot and perimeter fencing. Tree clearing has occurred on this parcel in the last 3-years, this action would clear the remaining trees within the 14 acres.

This action does not result in a significant effect to vegetation. This determination was made from the analysis of vegetation as the PSA does not support unique or rare vegetative communities. No federally-listed threatened or endangered plant species occupy the PSA or surrounding area. No significant reasonably foreseeable effects would result to vegetation with the Proposed Action. No further analysis would be necessary and mitigation efforts would not be required.

Wildlife

This action does not result in a significant effect to wildlife populations. This determination was made from the analysis of wildlife, as the PSA does not support suitable or sufficient foraging, breeding, nesting or refugia habitats for any of the federally-listed threatened or endangered wildlife species. Additionally, the species which may occur within the PSA are very common species found throughout the surrounding area. A response from the USFWS, dated May 02, 2025, states “no federally listed species or critical habitat are known to occur in the project area also this project will have no significant impact on fish and wildlife resources”. No significant reasonably foreseeable effects would result to wildlife with the Proposed Action; therefore, no further analysis would be necessary and mitigation efforts would not be required.

Environmentally Sensitive and Critical Habitats

There are no federally-listed or state designated critical habitat areas within the PSA or immediate surrounding areas. No significant reasonably foreseeable effects would result to environmentally sensitive and critical habitats with the Proposed Action. No further analysis is necessary.

5.3 Farmland

5.3.1 Regulatory Setting

Chapter 6 of the Desk Reference describes farmlands as any agricultural area considered to be prime, unique, or of statewide or local importance. The Farmland Protection Policy Act (FPPA) regulates all federal actions that have the potential to convert farmland to non-agricultural uses, including such farmlands identified in the Desk Reference. The United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) acts as the oversight agency for FPPA and has the final authority for designating farmlands.

5.3.2 Significant Impact Threshold

Exhibit A-1 of FAA Order 1050.1G provides the significance threshold for farmlands as “A significant impact would occur when: The total combined score on Form AD-1006, “Farmland Conversion Impact Rating,” ranges between 200 and 260 points.” Additional factors to consider include situations in which the Proposed Action would potentially convert important farmlands to non-agricultural uses.

5.3.3 Affected Environment / Analysis

During early coordination for this EA, the USDA-NRCS Web Soil Survey was utilized to identify soil types within the PSA. The PSA includes the following two (2) soil types listed below.

- Kipling clay loam, 1 to 5 percent slopes (KpC)
- Sumter-Watsonia complex, 3 to 8 percent slopes, eroded (SwD2)

The KpC soils were identified as prime farmland, per the NRCS database.

The undeveloped property within the PSA is currently owned by the Airport and is designated for airport use. A concurrence letter was submitted to the local USDA-NRCS office for their assessment of the project. The USDA-NRCS Resource Soil Scientist responded with a letter dated May 28, 2025 stating the project is construction of a new minor secondary structures and is therefore exempt from the Farmland Protection Policy Act (FPPA), in addition only assistance and actions that would convert farmland to non-agricultural uses are subject to this act. A copy of the exemption letter can be found in **Appendix D**. (The attached United States Department of Agriculture (USDA/NRCS) letter, requesting comments on the Greensboro Municipal Airport (A70) project and included in Appendix D, is dated 2020; this is incorrect, and the correct date should be 2025).

5.3.4 Environmental Consequences of Alternatives

5.3.4a Alternative 1: No-Action

The PSA is located within the current boundary of the airport property which is designated for airport use. The FPPA does not apply to land that is already committed to “urban development or water storage” which includes the PSA. The No-Action alternative would not change this designation. No reasonably foreseeable effects to farmland would occur. No further analysis would be necessary and mitigation efforts would not be required.

5.3.4b Alternative 2: Proposed Action

The PSA is located within the current boundary of the airport property which is designated for airport use. The FPPA does not apply to land that is already committed to “urban development or water storage” which includes the PSA. Alternative 2 would not change this designation. No reasonably foreseeable effects to farmland would occur. No further analysis would be necessary and mitigation efforts would not be required.

5.4 Hazardous Materials, Solid Waste, and Pollution Prevention

This chapter includes an assessment of any hazardous material(s) that might be used during the construction or operation of a Proposed Action. With respect to solid waste and pollution prevention, the analysis should identify any anticipated refuse materials that may be discarded on the project site and the ability to avoid, prevent, or reduce pollutant discharges or emissions.

5.4.1 Regulatory Setting

Chapter 7 of the Desk Reference identifies the Environmental Protection Agency (EPA) as the federal agency tasked with the compliance and enforcement of regulations involving hazardous substances. The following federal statutes (and state equivalents, if applicable) are those that address hazardous materials, solid waste, and pollution prevention as a part of the NEPA process and are applicable to the activities of the Proposed Action.

5.4.1a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)

Referred to as “CERCLA”, this Act is directed by the EPA and institutes financial liability for those responsible in hazardous substance releases. In situations where the responsible entity cannot be identified, a trust was established that provides such finances for cleanup. Additionally, this Act establishes the National Priority List 5.9 (NPL), which is a listing of sites with known releases or threatened releases of hazardous substances in the United States and its territories. The NPL is helpful in assessing sites that may require further investigation. The current National Priority List sites can be viewed and researched by state at <https://www.epa.gov/superfund/national-priorities-list-npl-sites-state>. Additionally, the EPA hosts another interactive website, www.epa.gov/cleanups, that provides information on various types of federal programs responsible for the identification and cleanup of land throughout the United States.

5.4.1b Pollution Prevention Act

This act is regulated by the EPA and is intended to require pollution prevention and reduction control of source pollutants so that wastes (hazardous and non-hazardous) would have less of an impact on the environment.

5.4.1c Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) established guidelines for the generation, storage, treatment, and disposal of hazardous waste and non-hazardous solid waste in the United States. Program goals are the protection of human health and the environment, the conservation of energy and natural resources, the reduction of waste volumes and the sustainable, responsible management of waste products. Three different programs within the RCRA are established for the oversight of separate waste types identified as 1) Hazardous wastes; 2) Non-hazardous wastes; and 3) Underground storage tanks (UST). Of these programs, the hazardous wastes and non-hazardous waste programs are most relevant to FAA actions, per the Desk Reference.

5.4.1d Executive Order 12088, Federal Compliance with Pollution Control Standards

This Executive Order directs federal agencies to comply with applicable pollution control standards and to consult with the EPA, state, and local agencies concerning the best

management practices (BMPs) available for the prevention, control, and abatement of environmental pollution. To meet the directives of this Order, NEPA documents should identify how the FAA is complying with the applicable pollution control standards.

5.4.1e FAA Orders and Advisory Circulars

The Desk Reference lists several FAA Orders and Advisory Circulars (AC) to be consulted as part of the NEPA process. Those applicable to the Proposed Action of this EA include:

- Order 1050.10D, Environmental Pollution Control and Abatement at FAA Facilities
https://www.faa.gov/documentLibrary/media/Order/FAA_Order_1050.10D.pdf
- AC 150/5320-15A, Management of Airport Industrial Waste
http://www.faa.gov/documentLibrary/media/advisory_circular/150-5320-15A/150_5320_15a.pdf

5.4.1f State Regulations

Within the State of Alabama, the Alabama Department of Environmental Management (ADEM) holds primary oversight for the regulation, compliance, and enforcement of policies regarding hazardous waste, solid wastes and pollution prevention. There are numerous state laws pertaining to this impact category and many different Division offices within the Department are responsible for components of each. Successful compliance with applicable state law should be achieved by coordination with the appropriate ADEM Division offices.

5.4.2 Significant Impact Thresholds

A significance threshold for hazardous materials, solid waste or pollution prevention has not been established yet by the FAA. However, factors to consider regarding this category include a consideration for whether the Proposed Action or alternatives would violate any applicable federal, state, local, or tribal laws; or create an adverse impact to human health and the environment; or result in a considerable amount of hazardous or non-hazardous waste that may exceed local capacity. The site for the proposed activities should also be investigated to identify if it holds a record for contamination, such as a site listed on the EPA NPL or mapped as a site undergoing cleanup as part of one or more established federal programs. Additionally, the Proposed Action and alternatives should demonstrate compliance with any applicable FAA Orders or ACs pertaining to hazardous materials, solid waste or pollution prevention.

5.4.3 Affected Environment / Analysis

In order to remain compliant with NEPA and all applicable FAA guidance, an analysis was completed with regard to hazardous and nonhazardous solid waste and pollution prevention. A Phase I Environmental Site Assessments (ESAs) was completed for the PSA in April of 2020 prior to property acquisition. The Phase I ESA noted the property as a wooded area consisted mostly of a pine overstory and a privet shrub layer, additionally there were no structures identified on the property.

The Assessment did not reveal any Recognized Environmental Conditions (RECs) and no further investigation was deemed necessary.

A reconnaissance of the PSA did not identify the presence of any REC's. No hazardous waste, solid waste, or pollution discharges were noted. Lastly, EPA's NEPAAssist database was utilized to run National and State reports for information relative to the project's delineated area (PSA). The NEPAAssist report did not reveal any significant permitted/compliance/enforcement solid waste or hazardous waste related issues within the PSA.

5.4.4 Environmental Consequences of Alternatives

5.5.4a Alternative 1: No Action

The No Action alternative would leave the site unchanged from the existing condition. As such, the No Action alternative would not generate hazardous waste, solid waste or result in pollution discharges beyond existing conditions. No significant reasonably foreseeable effects would result and no further analysis would be necessary and mitigation efforts would not be required.

5.5.4b Alternative 2: Proposed Action

During construction, the use of materials classified as hazardous or regulated would consist primarily of fuels and other petroleum-based substances used for vehicle and equipment operation. The construction contractor(s) would be required to store these materials in dedicated staging areas and implement appropriate federal and state BMPs in order to reduce the potential for impacts associated with the handling and use of these materials.

Solid wastes associated with construction of the proposed action and alternative are expected to be comprised of waste materials typical of earthwork and paving projects. The volume of solid waste is expected to be minor during construction. Construction waste not diverted, recycled, or re-used would be transported to and disposed of in local permitted construction/demolition facilities or in accordance with applicable state and local requirements. Therefore, no significant construction-related solid waste impacts would occur.

Through the use of BMPs and adhering to federal, state, and local requirements, the Proposed Action is not anticipated to result in significant reasonably foreseeable hazardous materials, solid waste, or pollution impacts. No further analysis would be necessary and mitigation efforts would not be required. If hazardous materials are encountered and identified during construction activities, the proper regulatory agencies will be notified and appropriate actions will be taken by the airport Sponsor and the contractor.

5.5 Historical, Architectural, Archeological, and Cultural Resources

The Desk Reference defines resources within this environmental impact category as "past and present expressions of human culture and history in the physical environment, such as prehistoric and historic archaeological sites, structures, objects, districts, which are considered important to a

culture or community. Historical, architectural, archeological, and cultural resources also include aspects of the physical environment, namely natural features and biota, which are a part of traditional ways of life and practices and are associated with community values and institutions.” Any potential impacts to historical, architectural, archeological, and/or cultural resources that may result from changes in visual effects or negative effects of light emissions should also be discussed in this section, per the Desk Reference.

5.5.1 Regulatory Setting

There are numerous regulations regarding resources within this impact category. The full listing of applicable federal policies is listed within Appendix B.7 of the FAA Desk Reference. The following federal statutes (and state equivalents, if applicable) related to historical, architectural, archeological, and cultural resources may be applicable to the activities of the Proposed Action.

5.5.1a Historic Sites Act

This national policy Act declares that historic sites, objects, properties of national significance, and other similar resources be preserved in public use. It allows the federal government authority to conduct historic surveys, secure and preserve historic data, and to acquire and preserve archeological and historic sites. The Act also establishes the NHLs program which designates “properties having exceptional value in commemorating or illustrating the history of the United States.”

5.5.1b National Historic Preservation Act

Under Section 106 of the National Historic Preservation Act of 1966 (NHPA), the FAA is required to consider effects to properties listed on the National Registry of Historic Places (NRHP) and coordinate with the appropriate State Historic Preservation Officer (SHPO) on all undertakings that have the potential to affect historic properties. Section 110(f) of the NHPA requires the FAA to evaluate impacts to NHLs. It should be noted that NEPA and NHPA are two separate statutes and each has a unique set of regulations and differing review processes. However, they require similar scoping and agency consultation.

5.5.1c State Regulations

The Alabama Historical Commission (AHC) acts as the SHPO for Alabama. As such, the AHC has specific responsibilities throughout the Section 106 review process, including offering consultation on the Area of Potential Effect (APE) for a proposed activity. This agency accomplishes their mission through “...two fields of endeavor: preservation and promotion of state-owned historic sites as public attraction; and statewide programs to assist people, groups, towns, and cities with local preservation activities.”

Sites within the state that have been placed on the “National Register” of Historic Places can be identified by using the AHC online historic properties interactive map.¹ This tool is only useful in locating National Register sites and is not exhaustive of all known or unknown historical, architectural, archeological, and cultural resources.

5.5.2 Significant Impact Thresholds

A significance threshold for this environmental impact category has not been established yet by the FAA. However, FAA order 1050.1G indicates that special consideration should be given in “situations in which the proposed action or alternative(s) would result in a finding of Adverse Effect through the Section 106 process.” It should be noted that NHPA regulations within 36 CFR § 800.8(a) state that an adverse effect finding does not necessarily require an EIS under NEPA. This is because an Adverse Effect under Section 106 does not directly correlate to a significant effect by NEPA review. In such cases, the FAA will make the final determination on the level of impact under NEPA. The Section 106 consultation process and guidance from the Advisory Council on Historic Preservation and the SHPO may assist the FAA in this determination.

5.5.3 Affected Environment / Analysis

The project area for Section 106 investigations is known as the Area of Potential Effects (APE). Per 36 CFR § 800.4(a), the APE is typically considered “...the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.” The Desk Reference also identifies other factors to consider when determining the APE. These include operational effects, such as increased noise, vibration, lighting, and increased traffic and ground-disturbing effects, such as site excavation, staging and construction areas.

A Cultural Resource Assessment was completed at the PSA by TG Earnest & Associates, dated August 12, 2025 (**Appendix B**). Background research consisted of examining Federal and State databases containing information regarding archaeological sites, historic structures, and historic properties within or near the PSA, as well as research designed to provide a basic historical context for the study area within which results could be objectively quantified. According to the Alabama Archaeological Site File there are no previous surveys or archaeological sites recorded within one mile of the PSA. There were no listings for the National Register of Historic Places (NRHP) or the Alabama Register of Landmarks and Heritage within or adjacent to the PSA. There were no historic properties within the physical APE. The existing airport control tower/ administrative building is over 50 years of age but is considered NRHP ineligible and does not meet the criteria for consideration as an historic property or as a contributing property to an historic district.

¹ <https://ahc.alabama.gov/nationalregister.aspx>

TG Earnest & Associates conducted the fieldwork for the CRA. The field investigation consisted of pedestrian transects, historic ornamental vegetation, soil drainage characteristics, and subsurface investigation. No cultural resources were observed on the surface or from subsurface testing. Based on the results of the CRA, TG Earnest & Associates concluded that the proposed project should have no historic properties effected within the physical or visual area of potential affect and should be allowed to proceed with no further archaeological investigations.

The FAA submitted the CRA to the Alabama Historical Commission, the response received on September 11, 2025 states upon review of the cultural resource assessment, we concur with the author's finding that project activities will have no effect on cultural resources eligible for or listed on the National Register of Historic Places and concur with the determination of No Effect to Historic Properties. The CRA submittal is attached in **Appendix B** and AHC concurrence letter is attached in **Appendix D**.

5.5.4 Environmental Consequences of Alternatives

5.5.4a Alternative 1: No-Action

The No-Action alternative would result in no construction, leaving the site unchanged from the existing condition. The area of the proposed project site would continue to be utilized for its current use. There were no known historical, architectural, archeological, and cultural resources. No further analysis would be necessary and mitigation efforts would not be required.

5.5.4b Alternative 2: Proposed Action

The Proposed Action would involve the expansion of Greensboro Municipal Airport terminal area, including modifications to the surrounding infrastructure. This includes the construction of a new apron adjacent to the existing runway, the construction of T-Hangars, Terminal, Fuel Tank, Box Hangars, parking lot and perimeter fencing. Since no archaeological sites were identified during the CRA investigation and the AHC concurred with the determination of No Effect to Historic Properties due to the project activities, no additional archaeological investigations are necessary and mitigation efforts would not be required.

5.6 Land Use

Compatible land use on and near to an airport is usually associated with noise impacts. However, in addition to noise other potential impacts of FAA actions on compatible land uses may involve the "disruption of communities, relocation, induced socioeconomic impacts, and land uses protected under Section 4(f). "Land uses in regards to these resources are discussed in their respective sections. With respect to airports, discussion of this impact category should give assurances that activities associated with each alternative conform to compatible land uses to the greatest extent practicable. This also applies to lands in the immediate vicinity of the airport and should include any applicable zoning regulations. The assurances must correlate to known existing and planned land uses.

5.6.1 Regulatory Setting

Chapter 9 of the Desk Reference identifies the regulations and statutes that may be related to the evaluation of Land Use. The following federal regulations (and state equivalents, if applicable) are those that address compatible land use at airports and are applicable to the activities of the Proposed Action.

The Airport Improvement Program (AIP) is a federal program supplying grants for the planning and development of qualifying projects at public-use airports included in the NPIAS. For a proposed project to be considered for AIP funding, assurances must be provided that a project is consistent with existing development and/or land use plans for the area in which the airport is located. This includes assurances that proposed activities are compatible with normal airport operations, including the landing and takeoff of aircraft.

5.6.2 Significant Impact Threshold

The FAA has not established a significance threshold for land use. However, the Desk Reference indicates that “if the proposal would result in other impacts that have land use ramifications, for example, disruption of communities, relocation, and induced socioeconomic impacts, the impacts on land use should be analyzed in these contexts and described accordingly”. Additionally, while the EA must identify whether a proposed action or alternative(s) are consistent with state or local plans, an inconsistency may not, by itself, automatically generate a significant impact under NEPA review.

5.6.3 Affected Environment / Analysis

In many cases, existing and planned land uses are determined by zoning ordinances put into place by the municipality having jurisdiction over the location of the land parcel. According to the Greensboro Zoning Ordinance, the Greensboro Municipal Airport is zoned for the Manufacturing District. There will be no changes to the zoning ordinance for the proposed project. The majority of the surrounding land uses have not changed and consists primarily of residential, and institutional uses.

5.6.4 Environmental Consequences of the Alternatives

5.6.4a Alternative 1: No-Action

The No-Action alternative will not change the existing or future land uses within airport property or in areas within the immediate vicinity of the airport. As a result, it will have no reasonably foreseeable effects on land use. No further analysis is required.

5.6.4b Alternative 2: Proposed Action

The Proposed Action would take place exclusively within property already owned by Greensboro Airport and zoned for institutional and light industrial. The proposed land use would be compatible with the designated and existing land uses; therefore, no further analysis is required.

5.7 Socioeconomics and Children's Environmental Health and Safety Risks

This section covers socioeconomics (Section 5.7.1) and children's environmental health and safety risks (Section 5.7.2).

5.7.1 Socioeconomics

Socioeconomics is an umbrella term used to describe aspects of a project that are either social or economic in nature. A socioeconomic analysis evaluates how elements of the human environment such as population, employment, housing, and public services might be affected by the proposed action and alternative(s).

5.7.1a Regulatory Setting

The primary statute related to socioeconomic impacts is the Uniform Relocation Assistance and Real Property Acquisitions Policy Act of 1970. In summary, this act contains provisions that must be followed if acquisition of real property or displacement of people would occur as a result of implementing the selected alternative.

5.7.1b Significance Threshold

The FAA has not established a significance threshold for socioeconomics in FAA Order 1050.1G; however, the FAA has identified factors to consider when evaluating the context and intensity of potential environmental impacts for socioeconomics (see Exhibit A-1 of FAA Order 1050.1G). Please note that these factors are not intended to be thresholds. If these factors exist, there is not necessarily a significant impact; rather, the FAA must evaluate these factors in light of context and intensity to determine if there are significant impacts.

5.7.1c Environmental Consequences of the No-Action Alternative

The No-Action alternative will not change the human environment such as population, employment, housing, and public services in the location of the proposed airport or in areas within the immediate vicinity of the proposed airport. As a result, it will have no reasonably foreseeable socioeconomic impacts. No further analysis is required.

5.7.1d Environmental Consequences of the Proposed Action

The proposed action would not have a potential impact on population, employment, housing, and public services within the PSA. This alternative would utilize property that is owned by the airport and would not require the acquisition of additional property. This alternative would require Airport Loop Road to be dead ended into the new terminal; this would enable development closer to the utilities on Millwood Road and separate the airport entrance from other uses on Airport Loop Road. This closure on Airport Loop Road adjacent to the airport would prevent a resident from accessing their house from the north on airport loop road. Instead, this resident would be required to access their driveway from the south on airport loop road, this alternative route would not require the resident's driveway from being relocated. There would be no relocation of residences, or businesses;

therefore; no significant social impacts are anticipated due to the implementation of this alternative.

5.7.2 Children's Environmental Health and Safety Risks

Pursuant to Executive Order 13045, Protection of Children from Environmental Health Risks and Safety Risks 62 Federal Register 19885, (April 21, 1997), Federal agencies are directed, as appropriate and consistent with the agency's mission, to make it a high priority to identify and assess environmental health risks and safety risks that may disproportionately affect children. The FAA is encouraged to identify and assess environmental health risks and safety risks that the agency has reason to believe could disproportionately affect children. Environmental health risks and safety risks include risks to health or to safety that are attributable to products or substances that a child is likely to come in contact with or ingest, such as air, food, drinking water, recreational waters, soil, or products they might use or be exposed to.

5.7.2a Significance Threshold

The FAA has not established a significance threshold pertaining to impacts to children's environmental health and safety in FAA Order 1050.1G; however, the FAA has identified a factor to consider when evaluating the context and intensity of potential environmental impacts for children's environmental health and safety (see Exhibit A-1 of FAA Order 1050.1G). Please note that this factor is not intended to be a threshold. If this factor exists, there is not necessarily a significant impact; rather, the FAA must evaluate this factor in light of context and intensity to determine if there are significant impacts. The factor to consider that may be applicable to children's environmental health and safety includes, but is not limited to, situations in which the proposed action or alternative(s) would have the potential to lead to a disproportionate health or safety risk to children.

5.7.2b Environmental Consequences of the No-Action Alternative

The No-Action alternative would not have an impact on other environmental categories nor would it have an impact on the physical or natural environment that would affect children's health or safety. As a result, it will have no reasonably foreseeable children's health or safety impacts. No further analysis is required.

5.7.2c Environmental Consequences of the Proposed Action

The proposed action would have no impact on the physical or natural environment that would affect children's health or safety. There are no schools, daycares, parks or children's health clinics in the location of the proposed action activities. As a result, it will have no reasonably foreseeable children's health or safety impacts. No further analysis is required.

5.7.2d Mitigation

There will be no mitigation required for this project.

5.8 Noise and Noise-Compatible Land Use

FAA Order 1050.1G, Appendix C references the 1050.1F Desk Reference for common noise mitigation measures. Noise is defined as unwanted sound that can interfere with normal activities and lead to annoyance, including impacts such as disrupted sleep, conversation, and learning environments (FAA 1050.1F Desk Reference). Aviation noise is, typically, the predominant public concern regarding aviation activities. As such, compatible land use (for both existing and planned uses) is often evaluated with emphasis on identifying the level for acceptable aircraft noise that will not cause adverse impacts to the surrounding community. Relevant land use plans as well as a general overview of existing and planned land uses should be considered in the evaluation of this category.

5.8.1 Regulatory Setting

In summary, FAA Order 1050.1G, Order 5050.4B, and the FAA's Part 150, Airport Noise Compatibility Planning Program (14 CFR Part 150) provide the regulatory framework for evaluating noise related to aircraft operation. Order 1050.1G requires that a significant noise impact must be determined through the use of the FAA's Aviation Environmental Design Tool 4A (AEDT 4A) along with local land use guidance and general guidance contained in Appendix A of 14 CFR Part 150. 14 CFR Part 150 establishes metrics on the extent of noise exposure surrounding an airport. It also includes guidelines identifying compatible and incompatible land uses within various (DNL) contours. DNL contours are used for airport noise assessments.

It should be noted that state and local agencies may hold noise and land use compatibility standards which differ from FAA requirements. Such local standards must be disclosed to the extent required under 40 CFR §§ 1502.16(c) and 1506.2(d). However, the FAA does not use local standards to determine the significance of noise impacts.

5.8.2 Significance Threshold

FAA's Aviation Environmental Design Tool 4A (AEDT 4A) is used for calculating the DNL noise levels at a location and plotting, specifically, the aircraft noise contours. The noise levels are solely due to aircraft activity and do not include background or ambient noise levels. The 65 DNL contour is a common FAA threshold as DNLs greater than 65 decibels (dB) are not typically considered compatible with residential land uses.

FAA Order 1050.1G clearly defines the significance threshold for noise as "The action would increase noise by DNL 1.5 dB or more for a noise sensitive area that is exposed to noise at or above the DNL 65 dB noise exposure level, or that will be exposed at or above the DNL 65 dB level due to a DNL 1.5 dB or greater increase, when compared to the no action alternative for the same timeframe." For those actions that require a noise analysis, the Order further instructs that "the determination of significance must be obtained through the use of noise contours and/or grid point analysis along with local land use information and general guidance contained in Appendix A of 14 CFR part 150."

5.8.3 Affected Environment / Analysis

No noise analysis is needed for projects involving Design Group I and II airplanes (wingspan less than 79 feet) in Approach Categories A through D (landing speed less than 166 knots) operating at airports whose forecast operations do not exceed 90,000 annual propeller operations (247 average daily operations) or 700 annual jet operations (2 average daily operations), therefore no noise analysis is needed for this project falls in the design Group I and II.

5.8.4 Environmental Consequence of Alternatives

5.9.4a Alternative 1: No-Action

The no action alternative will not change the existing noise at the airport or the immediate vicinity of the airport. As a result, it will have no reasonable foreseeable impacts. No further analysis is required.

5.9.4b Alternative 2: Proposed Action

The proposed action project involves Design Group I and II airplanes; therefore, the proposed action will not change the existing noise at the airport or the immediate vicinity of the airport. As a result, it will have no reasonable foreseeable noise impacts. No further analysis is required.

5.8.5 Mitigation Measures for Proposed Action

There would be no mitigation required for this project.

5.9 Visual Effects

FAA Order 5050.4B and FAA Order 1050.1G require project sponsors to identify the light emissions (e.g., strobe lights, high-intensity airfield or facility lighting) associated with a Proposed Action that could visually affect a light-sensitive area (including residential areas, parks, and recreational areas). The FAA is also required to consider whether visual or aesthetic impacts would result from a Proposed Action.

5.9.1 Regulatory Setting

There are no formal federal regulations, permits or other approvals that are related to this impact category. However, there may be special purpose laws and requirements that should be researched during analysis. Informal consultation is recommended with local agencies, adjacent communities, and the AHC, as Section 106 and or Section 4(f) resources may be influenced by changes to visual effects. There also may be state and local regulations, policies, and zoning ordinances that apply to visual effects and or light emissions.

5.9.2 Significance Threshold

The FAA has not established a significance threshold for either light emissions or visual effects. The Desk Reference does include factors and questions to consider when analyzing this category. For

Light Emissions, this includes an evaluation to determine whether the Proposed Action will cause a general annoyance or interfere with normal activities. Additionally, potential negative impacts to the visual character of the area due to light emissions from the proposed project should be considered. These include determining the importance, uniqueness, and aesthetic value of visual resources in the area. With respect to Visual Effects, the assessment should also address the potential for the Proposed Action to contrast with the visual character of the area and if the activity will negatively affect the nature of the area's visual character, including the importance, uniqueness, and aesthetic value. Finally, if the Proposed Action will block or obstruct the views of visual resources, this effect should also be discussed.

5.9.3 Affected Environment / Analysis

The affected environment for visual effects includes the PSA, as well as areas immediately adjacent and surrounding the PSA. This section will identify the extent that the proposed project may produce light emissions that may interfere with normal activity or affect the area, which is visually characterized by undeveloped forested land, rural residential, commercial and industrial land use outside the airport. There are no recorded scenic resource protection areas, such as Wild and Scenic Rivers, or areas of similar designation in visual proximity to the airport. **Section 5.9.4** below provides a summary of the factors to consider when performing an analysis of impacts to this category, as described in Exhibit A-1 of FAA Order 1050.1G.

5.9.4 Environmental Consequences of the Alternatives

5.10.4a Alternative 1: No-Action

The No-Action alternative will result in no construction or activities associated with the proposed action; therefore, will not have any visual effects. No further analysis is required.

5.10.4b Alternative 2: Proposed Action

Significant change to the visual aesthetic of the airfield will not occur nor will the resulting visual effects conflict with the existing environment. There are no recorded scenic resource protection areas, such as Wild and Scenic Rivers, or areas of similar designation in visual proximity to the airport. The PSA currently consists of property owned by the airport and zoned for institutional and light industrial. Additionally, no historic properties are located within the project view shed. No reasonably foreseeable visual effects are anticipated due to the implementation of the Proposed Action. No further analysis would be required

5.10 Water Resources

According to the EPA's website (<https://www.epa.gov/report-environment/water>) Water Resources are defined as "lakes, streams, groundwater, coastal waters, wetlands, and other waters; their associated ecosystems; and the human uses they support (e.g., drinking water, recreation, and fish consumption)." The quality and distribution of available water resources are essential to both human and ecosystem health. Proper stewardship of water resources also promotes proper functionality and sustainability of the hydrologic cycle. Per the Desk Reference, this chapter should discuss the following main topics: a) Wetlands;

b) Floodplains; c) Surface Waters; d) Groundwater; and e) Wild and Scenic Rivers. Each of these components is interrelated within a watershed and, as a whole, support the local watershed system.

Non-Applicable Water Resource Impact Categories

Floodplains

Floodplains are defined in DOT Order 5650.2 as “lowlands and relatively flat areas adjoining inland and coastal waters including flood prone areas of offshore islands.” All FAA actions must avoid floodplains to the greatest extent practicable. The objective of an EA floodplain analysis is to determine if a proposed action encroaches on the base floodplain. The 100-year floodplain is considered the base floodplain in this evaluation and Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs) are used as the primary information source. In order to differentiate between differing levels of flood hazard, FEMA created an array of zones corresponding to a location’s actual flood risk. The FEMA flood zone designations include: Zone A (subject to inundation by the 1% annual-chance flood event with no base flood elevation (BFE) determined), Zone AE (subject to inundation by the 1% annual-chance flood event with BFE determined), Zone VE (subject to inundation by the 1% annual-chance flood event with additional hazards due to storm waves, BFE determined), and Zone X (minimal risk areas outside the 1% and 0.2% annual-chance floodplains with no BFE or base flood depths determined). In addition, some areas have special flood-related hazards and are designated as Special Flood Hazard Areas (SFHA). A SFHA is an area where National Flood Insurance Program (NFIP) floodplain management regulations must be enforced.

In this case, the PSA is not within a FEMA flood designated area. The nearest floodplain or floodway is located to the west of the PSA and within the secondary study area. This area is located within FEMA Flood Zone A. The Proposed Action would not result in floodplain encroachment; therefore, no further analysis is needed.

Groundwater

The Desk Reference defines groundwater as subsurface water that occupies the space between sand, clay and rock formations, and an aquifer as the geologic layers that have the ability to store or transmit groundwater to wells, springs and other water sources. The EPA has designated certain aquifers as sole source aquifers and if impacts are anticipated to a sole source aquifer, then the EPA regional office must be consulted with as required by the Safe Drinking Water Act (SDWA). To remain compliant with NEPA, the project boundaries were analyzed for EPA-designated sole source aquifers. None were identified. No effects to groundwater resources are expected.

Wild and Scenic Rivers

The Department of the Interior National Park Service (NPS), USFWS, Bureau of Land Management (BLM), and the Department of Agriculture (US Forest Service) has oversight of the Wild and Scenic Rivers Act of 1968. The FAA is required to determine if the Proposed Action or the No-Action alternative would affect a designated area under the National Wild and Scenic River System (WSRS) or a free-flowing water body designated under the Nationwide Rivers Inventory (NRI). The Sipsey Fork of the West Fork River within the Bankhead National Forest in northwest Alabama is the only river in Alabama designated as wild & scenic. No effects to WSRS or NRI designated water bodies are expected.

Regulatory Setting

The suite of applicable laws, statutes, and other regulations for this impact category is quite extensive and is fully disclosed within the Desk Reference. Some provisions include protections that overlap the impact categories discussed. **Table 5.0** provides some of the primary mandates for consideration when evaluating potential effects to applicable water resources categories by the proposed project. This list is not exhaustive. Thorough coordination with all regulatory agencies having authority over the proposed activities should be done to ensure full compliance with all applicable regulations.

TABLE 5.0: REGULATIONS APPLICABLE TO WATER RESOURCES FOR PROPOSED ACTION*

Statute	Applicable Impact Categories	Oversight Agency	Summary
Clean Water Act (CWA)	- Wetlands - Surface Waters	EPA, USACE, state, and tribal Water Quality Agencies	Establishes structure for regulating the discharge of pollutants into waters of the US. Specifically, CWA Section 303(d), Section 404, Section 401, and Section 402.
Executive Order 11990, <i>Protection of Wetlands</i> ;			
DOT Order 5660.1A, <i>Preservation of the Nation's Wetlands</i>	Wetlands	DOT	Requires federal agencies to “avoid to the extent possible” any adverse impacts to wetlands and to avoid direct or indirect support of new construction in wetlands wherever there is a “practicable alternative”. Transportation facilities should be designed and operated to assure the protection and enhancement of wetlands to the fullest extent practicable.
Fish and Wildlife Coordination Act	- Wetlands - Surface Waters	USFWS, NMFS, State wildlife agencies	Federal agencies are to consult with the USFWS and/or the NMFS, and appropriate state wildlife agencies regarding conservation of wildlife resources for projects that may affect the water of any stream or other water body, including wetlands.
Rivers and Harbors Act	- Wetlands - Surface Waters	USACE; USCG	Established to protect the navigability of waters used for commerce in the United States.
Safe Drinking Water Act	- Surface Waters - Groundwater	EPA	Prohibits federal agencies from funding actions that would contaminate an EPA-designated sole source aquifer or its recharge area.

DOT = U.S. Department of Transportation; EPA = Environmental Protection Agency; FEMA =Federal Emergency Management Agency; NFIP= National Floodplain Insurance Program NMFS = National Marine Fisheries Service; USACE = U.S. Army Corps of Engineers; USFWS = U.S. Fish and Wildlife Service.

**In addition to the above, there may be state and local regulations that apply to the proposed project. This is determined on a case-by-case basis by contacting relevant state and local agencies in the early stages of project planning.*

5.10.1 Wetlands

510.1a *Regulatory Setting for Wetlands*

Wetlands addressed in this section include jurisdictional wetlands and other Waters of the U.S. (WOTUS) designated under Section 404 of the CWA, further defined under 33 CFR § 328.3(a). Any surface water, or associated wetland, not meeting this federal definition is considered non-jurisdictional and does not receive statutory protection under the CWA. Under Section 404, the USACE has authority and responsibility for regulating activities that involve wetlands connected to WOTUS. Wetlands are lowland areas covered with shallow and sometimes temporary or intermittent waters. They include, but are not necessarily limited to the following: swamps, marshes, bogs, river overflows, and tidal overflows, as well as estuarine areas and shallow lakes and ponds with emergent vegetation. Wetlands have been federally characterized by the presence of specific types of vegetation, hydrology, and soils.

Filling or disturbing wetlands for commercial development, public infrastructure, etc. are some of the regulated activities controlled by a permit review process administered by the USACE. The USACE also enforces Executive Order 11990, Protection of Wetlands, which requires Federal agencies to avoid, to the extent possible, adverse impacts associated with the destruction or modification of wetlands. The State of Alabama has not adopted its own wetland regulations; however, if an alteration to a federally regulated wetland will occur as a part of a proposed action, then Water Quality Certification (WQC) must be obtained from ADEM, ensuring the proposed action would not violate state water quality standards. The USACE may require compensatory mitigation for impacts to wetland resources.

5.10.1b *Significance Threshold for Wetlands*

FAA Order 1050.1G identifies that significant impacts to wetlands would occur when a proposed activity would a) adversely affect a wetland's function to protect the quality or quantity of municipal water supplies (including surface waters and sole source or other aquifers); b) substantially alter the hydrology needed to sustain the affected wetland's values and functions (or those of a connected wetland); c) substantially reduce the affected wetland's ability to retain floodwaters or storm runoff, thereby threatening public health, safety or welfare (welfare includes cultural, recreational, and scientific resources or property important to the public); d) adversely affect the maintenance of natural systems supporting wildlife and fish habitat, or economically important timber, food, or fiber resources of the affected or surrounding wetlands; e) promote development of secondary activities or services that would cause the circumstances listed above to occur; or f) be inconsistent with applicable state wetland strategies.

5.10.1c *Affected Environment / Analysis*

According to an approved AJD letter from the USACE (**Appendix C**), received on September 8, 2025, states the Greensboro Municipal Airport consists of a non-jurisdictional dry land area that does not contain federally regulated wetlands or other waters of the United States and is not

subject to the USACE federal permitting authority. Analysis to determine if these impacts are significant is necessary. **Table 6.0** provides a summary of the thresholds and factors to consider when performing an analysis of impacts to this category, as described in Exhibit A-1 of the FAA Order 1050.1G.

TABLE 6.0: SUMMARY OF WETLAND RESOURCE ANALYSIS

FAA Threshold	Proposed Action Meets or Exceeds Threshold?
Threshold: Adverse effects to wetland's function to protect the quality or quantity of municipal water supplies, including surface waters and sole source and other aquifers	No
Threshold: Substantially alter the hydrology needed to sustain the wetland values and functions or those of a connected wetland	No
Threshold: Substantially reduce the wetland's ability to retain floodwaters or storm runoff, thereby threatening public health, safety or welfare	No
Threshold: Adversely affect the maintenance of natural systems supporting wildlife and fish habitat or economically important timber, food, or fiber resources of the affected or surrounding wetlands	No
Threshold: Promote development of secondary activities or services that would cause the circumstances listed above to occur	No
Threshold: Be inconsistent with applicable state wetland strategies	No

Source: Significance Thresholds and factors to consider established in FAA Order 1050.1G and FAA Desk Reference

GMC utilized a multi-step approach in order to conduct the delineation of water resources (including wetlands and streams) within the PSA. This consists of a review of readily available resources to preliminarily identify potential water resources within the PSA. These resources include a review of historical aerial photographs, USGS Quadrangle Maps, NRCS Web Soil Survey, and the USFWS National Wetland Inventory (NWI). A site reconnaissance was then performed to identify and delineate potential water resources in accordance with the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Atlantic and Gulf Coastal Plain Region (Version 2.0).

Professional Wetland Scientists and Biologists with GMC visited the PSA in March of 2020 to delineate all water resources, including wetlands and streams. The site was examined for the presence of hydric soils, hydrophytic vegetation, and wetland hydrology. A Munsell Soil Color Book was used to profile soil colors. GMC Biologist returned in February 2025 to reassess the PSA area.

According to an approved AJD letter from the USACE, received on September 8, 2025, states the Greensboro Municipal Airport consists of a non-jurisdictional dry land area that does not contain federally regulated wetlands or other waters of the United States and is not subject to the USACE federal permitting authority.

510.1d Environmental Consequence of the No-Action Alternative

The No-Action alternative will not result in any activities taking place at the airport and, therefore, will not have any impacts to wetlands. No further analysis would be required.

5.10.1e Environmental Consequences of the Proposed Action

The proposed action does not have direct impacts to wetlands and According to an approved AJD letter from the USACE, received on September 8, 2025, states the Greensboro Municipal Airport consists of a non-jurisdictional dry land area that does not contain federally regulated wetlands or other waters of the United States and is not subject to the USACE federal permitting authority.

5.10.1f Avoidance and Minimization of Wetland Impacts

The proposed action does not have direct impacts to wetlands and According to an approved AJD letter from the USACE, received on September 8, 2025, the Greensboro Municipal Airport consists of a non-jurisdictional dry land area that does not contain federally regulated wetlands or other waters of the United States and is not subject to the USACE federal permitting authority, therefore, no mitigation would be required for this project. Environmental impacts were considered during the alternative analysis and the Proposed Action was determined to have less impacts than Alternative 3. Environmental impacts are one of the driving factors in determining which alternative is the preferred.

The risk of soil erosion and the possible release of silt and sediment into water resources is always a potential consideration for construction projects. This most often occurs with new construction on undeveloped lands where bare soils and disturbed substrates are vulnerable to erosion from rainfall or other precipitation events. These temporary impacts can be minimized by implementing BMPs to protect water quality. These may include (but are not limited to) measures such as preserving existing vegetation, using sediment barriers, traps and settling basins, seeding/mulching or otherwise covering bare soil immediately, and installing silt fences. As such, BMPs will be outlined in the project plans and specifications and will be adhered to by the contractor, as specified by the ADEM Construction Stormwater General Permit. An Erosion and Sediment Control Plan (ESCP) and Construction Best Management Practice Plan (CBMPP) will be prepared. The CBMPP will graphically show the location of all permanent and temporary erosion and pollution control devices that will be installed and implemented for the Proposed Action.

5.10.1g Consultations, Permits, and Other Approvals for Wetland Impacts

The USACE has regulatory responsibilities pursuant to Section 404 of the Clean Water Act (33 U.S.C. 1344) and Section 10 of the Rivers and Harbors Act of 1899 (33 U.S.C. 403). Under Section

10, the USACE regulates any work in, or affecting, navigable waters of the U.S. It appears the review area does not include navigable waters of the U.S. and would not be subject to the provisions of Section 10. Under Section 404, the USACE regulates the discharge of dredged and/or fill material into waters of the U.S., including wetlands.

A USACE Approved Jurisdictional Determination (AJD) was issued for the PSA on September 8, 2025. The JD is attached in **Appendix C**. Based on the submitted information, the AJD states the 14.15- acre parcel consists entirely of non-jurisdictional dry land or upland areas that do not contain Federally-regulated wetlands or other “waters of the United States”. The AJD is based on current policy and regulation and is valid for a period of five (5) years from the date of the JD letter.

5.10.1h Mitigation for Wetland Impacts

The proposed action does not have direct impacts to wetlands and according to the attached approved AJD, there will be no jurisdictional waters or jurisdictional resources impacted by the proposed action, therefore, no mitigation is required.

5.10.2 Surface Waters

Per the FAA Desk reference, surface waters include “streams, rivers, lakes, ponds, estuaries, and oceans”. In addition to discussing impacts to these resource features, this section also discusses how to assess potential impacts to water quality standards that is not otherwise captured in discussion of other water resources in this impact category.

5.10.2a Regulatory Setting for Surface Waters

Similar to Wetland Resources, surface waters receive federal protection under the CWA, Safe Drinking Water Act (SWDA), the Fish and Wildlife Coordination Act, and the Rivers and Harbors Act. In addition to regulating direct impacts and/or modifications to surface waters, the CWA and SWDA also set standards for maintain water quality within surface waters. In addition to these regulations, this impact category is provided further protections by state statutes, as described below.

The ADEM facilitates the federal National Pollutant Discharge Elimination System (NPDES) program. This program was developed to reduce the discharge of pollutants to creeks, rivers, and lakes by means of a permitting process. The most common in Alabama is the NPDES Construction Stormwater Permit. This permit is obtained from the ADEM Water Division and is required for all construction projects involving clearing, grading, or excavation resulting in the disturbance of one or more acres. It may also apply to projects that would result in the disturbance of less than an acre, if it is part of a larger development.

5.10.2b *Significance Threshold for Surface Waters*

FAA Order 1050.1G indicates the threshold for significant impacts to Surface Waters will occur if the Proposed Action would:

- Exceed water quality standards established by federal, state, local, tribal agencies; or
- Contaminate public drinking water supply such that public health may be adversely affected.

In addition to these thresholds, FAA Order 1050.1G provides additional factors to consider when evaluating potential impacts to surface waters. These factors are not intended to be thresholds and, should one or more of the factors exist, that does not automatically imply a significant impact for NEPA review. The FAA will evaluate the context and intensity of the given factors to determine if impacts are significant. These factors include, but may not be limited to, situations in which the Proposed Action may have the potential to a) adversely affect natural and beneficial water resource values to a degree that substantially diminishes or destroys such values; b) adversely affect surface waters such that the beneficial uses and values of such waters are appreciably diminished or can no longer be maintained and such impairment cannot be avoided or satisfactorily mitigated; or c) present difficulties based on water quality impacts when obtaining a permit or authorization.

5.10.2c *Affected Environment / Analysis*

The Proposed Action includes the construction of a new apron adjacent to the existing runway, this includes the construction of T-Hangars, Terminal, Fuel Tank, Box Hangars, parking lot and perimeter fencing. The project requires the development of currently undeveloped land; however, there are no potential impacts to surface waters. There will be no direct impacts and/or modifications to surface waters that may affect water quality, however an NPDES permit will be applied for prior to the onset of construction. Additionally, a USACE Approved Jurisdictional Determination (AJD) was issued for the PSA on September 8, 2025. The JD is attached in **Appendix C. Table 7.0** provides a summary of the thresholds and factors to consider when performing an analysis of impacts to this category, as described in Exhibit A-1 of the Desk Reference.

TABLE 7.0: SUMMARY OF SURFACE WATER RESOURCE ANALYSIS

FAA Threshold or Factor	Effect of the Proposed Action
Threshold: The Proposed Action will exceed established water quality standards	Coverage under an ADEM Construction Stormwater General permit would be obtained for the proposed action. Upon completion of construction, all exposed soils would be stabilized with native vegetation. Water quality standards would be maintained.

Threshold: The Proposed Action would contaminate public drinking water supply and public health may be affected	Coverage under an ADEM Construction Stormwater General permit would be obtained for the proposed action. No effects to the public drinking water supply would be generated.
Factor: Natural and beneficial water resource values will be substantially diminished or destroyed by effects from the Proposed Action	Coverage under an ADEM Construction Stormwater General permit would be obtained for the proposed action. Upon completion of construction, all exposed soils would be stabilized with native vegetation in order to prevent the discharge of sediment into natural water resources. No substantial impacts to water resource values are anticipated.
Factor: The Proposed Action would impact beneficial uses and values of surface waters so that they are appreciably diminished or can no longer be maintained. This impairment cannot be avoided or satisfactorily mitigated	Coverage under an ADEM Construction Stormwater General permit would be obtained for the proposed action. Upon completion of construction, all exposed soils would be stabilized with native vegetation in order to prevent the discharge of sediment into natural water resources. No substantial impacts to water resource values are anticipated.
Factor: The Proposed Action will present difficulties due to water quality impacts when obtaining a permit or authorization	The Proposed Action includes common construction activities and subsequent facilities that are designed in compliance with federal and state standards. No difficulties are anticipated in obtaining necessary permits.

Source: Significance Thresholds and factors to consider established in FAA Order 1050.1G and FAA Order 1050.1 Desk Reference

5.10.2d Environmental Consequences of the No-Action (Alternative 1)

The No-Action alternative will result in no construction; there would be no direct impacts and/or modifications to surface waters that may affect water quality. No further analysis would be required.

5.10.2e Environmental Consequences of the Proposed Action (Alternative 2)

The proposed action does not have direct impacts to wetlands and according to an approved AJD letter from the USACE, received on September 8, 2025, states the Greensboro Municipal Airport consists of a non-jurisdictional dry land area that does not contain federally regulated wetlands or other waters of the United States and is not subject to the USACE federal permitting authority. There would be no jurisdictional waters or jurisdictional resources impacted by the proposed action. An NPDES permit would be applied for before the onset of construction. No further analysis would be required.

5.10.2f Avoidance and Minimization of Surface Water Impacts

The proposed action does not have direct impacts to wetlands and according to an approved AJD letter from the USACE, received on September 8, 2025, states the Greensboro Municipal Airport consists of a non-jurisdictional dry land area that does not contain federally regulated wetlands or other waters of the United States and is not subject to the USACE federal permitting authority. Environmental impacts were considered during the alternatives analysis and the Proposed Action was determined to have less impacts than Alternative 3.

The risk of soil erosion and the possible release of silt and sediment into water resources is always a potential consideration for construction projects. This most often occurs with new construction on undeveloped lands where bare soils and disturbed substrates are vulnerable to erosion from rainfall or other precipitation events. These temporary impacts can be minimized by implementing BMPs to protect water quality. These may include (but are not limited to) measures such as preserving existing vegetation, using sediment barriers, traps and settling basins, seeding/mulching or otherwise covering bare soil immediately, and installing silt fences. As such, BMPs will be outlined in the project plans and specifications and will be adhered to by the contractor, as specified by the ADEM Construction Stormwater General Permit. An Erosion and Sediment Control Plan (ESCP) and Construction Best Management Practice Plan (CBMPP) will be prepared. The CBMPP will graphically show the location of all permanent and temporary erosion and pollution control devices that will be installed and implemented for the Proposed Action.

5.10.2g Consultations, Permits, and Other Approvals for Surface Water Impacts

The U.S. Army Corps of Engineers (USACE) has regulatory responsibilities pursuant to Section 404 of the Clean Water Act (33 U.S.C. § 1344) and Section 10 of the Rivers and Harbors Act of 1899 (33 U.S.C. § 403). Under Section 10, the USACE regulates any work in, or affecting, navigable waters of the U.S. The review area does not include navigable waters of the U.S. and would not be subject to the provisions of Section 10. Under Section 404, the USACE regulates the discharge of dredged and/or fill material into waters of the U.S., including wetlands and stream.

As previously stated, a USACE Approved Jurisdictional Determination (AJD) was issued for the PSA on September 8, 2025. The JD is attached in **Appendix C**. Based on the submitted information, the AJD states the 14.15-acre parcel consists entirely of non-jurisdictional dry land or upland areas that do not contain Federally-regulated wetlands or other “waters of the United States”.

5.10.2h Mitigation for Surface Water Impacts

The proposed action does not have direct impacts to wetlands and according to the attached approved AJD, there will be no jurisdictional waters or jurisdictional resources impacted by the proposed action, therefore, no mitigation for surface waters would be required.

CHAPTER 6 CORRESPONDENCE AND PUBLIC INVOLVEMENT

6.1 Agency Coordination Summary

Coordination with applicable federal, state and local regulatory and commenting agencies has been initiated for this EA process. Thorough site inspections and the use of web-based investigative resources were also implemented. This combined effort assisted in the identification of potential environmental resources that may exist within the project area. **Table 8.0**, below, provides a list of agencies associated with regulation or oversight of the various environmental impact categories to be assessed. Each was sent a scoping letter requesting comments regarding the Proposed Action. **Appendix D** contains the full correspondence submitted and the agency responses.

TABLE 8.0: AGENCY COORDINATION

AGENCY CONTACTED	AGENCY REPRESENTATIVE	DATE OF GMC'S LETTER	DATE OF CONCURRENCE
Natural Resources Conservation Service	D'andre Yancey	April 21, 2025	May 28, 2025
Department of the Interior, Fish & Wildlife Service	Bill Pearson	April 21, 2025	May 02, 2025
State Historic Preservation Office	Amanda McBride	September 11, 2025	September 11, 2025
U.S. Army Corps of Engineers	Jevon Coleman	September 3, 2025	September 8, 2025

6.2 Public Involvement

To facilitate public participation, the Environmental Assessment (EA) was made available for public review during a 30-day period. A legal notice announcing the availability of the EA was published in the Greensboro Watchman. The notice informed the public aware of the proposed project and provided instructions on how to obtain additional information. Hard copies of the EA were also made available for public review. Any comments received during the public review period were considered and included as part of the final EA document.

Chapter 6 was updated after the public review period ended and after all coordination with appropriate state, local and federal agencies, had been completed and all public comments had been received. All correspondences will be included as **Appendix E**.

CHAPTER 7 LIST OF PREPARERS

Goodwyn Mills Cawood (GMC) – Prime Consultant

Sherri Groghan, CNRP
Environmental Scientist

CAREER SUMMARY

Sherri Groghan is an accomplished Environmental Scientist at GMC, specializing in Phase 1 Environmental Site Assessments, National Environmental Policy Act (NEPA) compliance, Environmental Assessments (EA), and State Revolving Fund environmental documentation. With extensive expertise in U.S. Army Corps of Engineers (USACE) delineating and permitting, as well as mitigation monitoring, Sherri brings a wealth of knowledge to environmental compliance and sustainability projects. Her 17-year tenure with the State of Alabama in Public Health Environmental services honed her skills in compliance inspections, soil and property assessments, program monitoring, and regulatory education for public and private entities. Sherri also has significant experience in complaint investigations, staff training, and solid waste compliance, making her a well-rounded professional dedicated to safeguarding environmental and public health standards.

Stuart A. Blackwell
Vice President of Environmental, North Region
Senior Biologist

CAREER SUMMARY

Stuart is a biologist with over 17 years of multi-disciplinary environmental experience which includes wetland delineation and permitting, stormwater permitting and inspections, stream restoration, mitigation banking, water quality analysis, Phase I Environmental Site Assessments (ESAs), threatened and endangered species surveys, U.S. Army Corps of Engineers permitting, and National Environmental Policy Act (NEPA) coordination. Stuart is proficient in performing legal research, onsite investigations, historical review, interviews, and preparation of written reports and has performed numerous NEPA studies for various federal and state agencies. He also has experience in ground water monitoring, well drilling, sampling, and abandonment, including soil borings and soil sampling. He also is a senior project biologist and manager for multiple stream/wetland mitigation bank in Alabama.

Appendices

Appendix A



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Alabama Ecological Services Field Office
1208 B Main Street
Daphne, AL 36526-4419
Phone: (251) 441-5181 Fax: (251) 441-6222
Email Address: alabama@fws.gov

In Reply Refer To:

02/13/2025 19:12:27 UTC

Project Code: 2025-0056358

Project Name: Greensboro Municipal Airport (7A0) Improvement Plan

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

Project consultation requests may be submitted by mail or email (Alabama@fws.gov). **Ensure that the Project Code in the header of this letter is clearly referenced in any request for consultation or correspondence submitted to our office.**

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered

species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf>

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts see <https://www.fws.gov/program/migratory-bird-permit/what-we-do>.

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures see <https://www.fws.gov/library/collections/threats-birds>.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit <https://www.fws.gov/partner/council-conservation-migratory-birds>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. **Ensure that the Project Code in the header of this letter is clearly referenced with any request for consultation or correspondence about your project that you submit to our office.**

Attachment(s):

- Official Species List

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Alabama Ecological Services Field Office

1208 B Main Street

Daphne, AL 36526-4419

(251) 441-5181

PROJECT SUMMARY

Project Code: 2025-0056358

Project Name: Greensboro Municipal Airport (7A0) Improvement Plan

Project Type: Airport - Maintenance/Modification

Project Description: The City of Greensboro intends to make improvements to the existing Greensboro Municipal Airport terminal with a new apron area, hangar building, and perimeter fencing.

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@32.68153625,-87.66188650848133,14z>



Counties: Hale County, Alabama

ENDANGERED SPECIES ACT SPECIES

There is a total of 4 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

MAMMALS

NAME	STATUS
Tricolored Bat <i>Perimyotis subflavus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/10515	Proposed Endangered

REPTILES

NAME	STATUS
Alligator Snapping Turtle <i>Macrochelys temminckii</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4658	Proposed Threatened

CLAMS

NAME	STATUS
Inflated Heelsplitter <i>Potamilus inflatus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/7286	Threatened

INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> There is proposed critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743	Proposed Threatened

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

IPAC USER CONTACT INFORMATION

Agency: Private Entity
Name: Hunter Nobles
Address: 2660 East Chase Lane, Suite 200
City: Montgomery
State: AL
Zip: 36117
Email: hunter.nobles@gmcnetwork.com
Phone: 3343205715

LEAD AGENCY CONTACT INFORMATION

Lead Agency: Federal Aviation Administration

Appendix B

A CULTURAL RESOURCE ASSESSMENT
OF THE GREENSBORO AIRPORT IMPROVEMENTS PROJECT,
HALE COUNTY, ALABAMA

TGEA Project No. 25.04.27

prepared for
Goodwyn Mills Cawood LLC
2400 5th Ave. South, Suite 200
Birmingham, AL 35233

by
Tray G. Earnest, RPA
Principal Investigator
Laura Lee Corbett
Architectural Historian
and
Matthew S. Kaczor, RPA

August 12, 2025



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I.0 Introduction

This report presents the results of a cultural resource assessment (CRA) conducted within the boundaries of a proposed airport improvement project in Hale County, Alabama (Figures 1.1-1.3). This assessment was conducted by TG Earnest and Associates in May 2025 at the request of Goodwyn Mills Cawood, LLC, for compliance with Section 106 of the *National Historic Preservation Act of 1966*, as amended, *36 CFR Part 800: Protection of Historic Properties* and the *National Environmental Policy Act of 1969*.

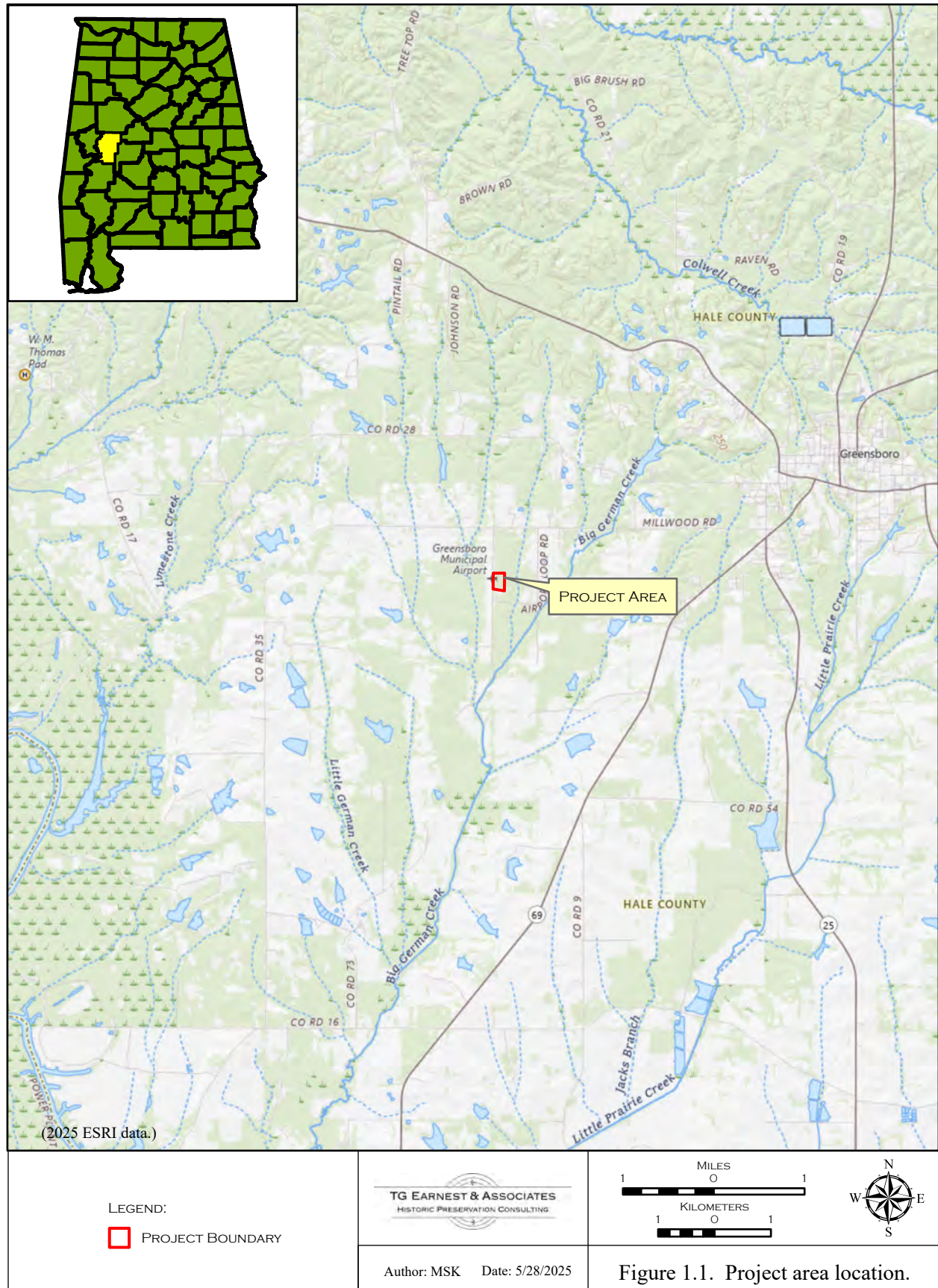
The purpose of this assessment was determining if historic properties would be impacted by expanding airport facilities within an adjacent parcel. For the purpose of this assessment, an ‘historic property’ may include archaeological sites, architectural resources (standing structures and historic districts), objects, and traditional cultural properties (TCPs). The term ‘historic property’ is also used at the Federal level to define archaeological sites or historic structures that meet eligibility criteria for inclusion on the National Register of Historic Places.

Field investigations were conducted by Tray G. Earnest (principal investigator) and Penelope Earnest. Historic structure evaluations were conducted by Laura Lee Corbett, architectural historian. The principal investigator is a Registered Professional Archaeologist (RPA, license no. 1534) with credentials that meet and exceed the qualifications established by the Secretary of Interior’s (SOI) professional guidelines (*Federal Register 48:190:44738-44739*; United States Department of the Interior, 1983; Appendix A). The project architectural historian also possesses qualifications that meet and exceed SOI qualifications (Appendix A).

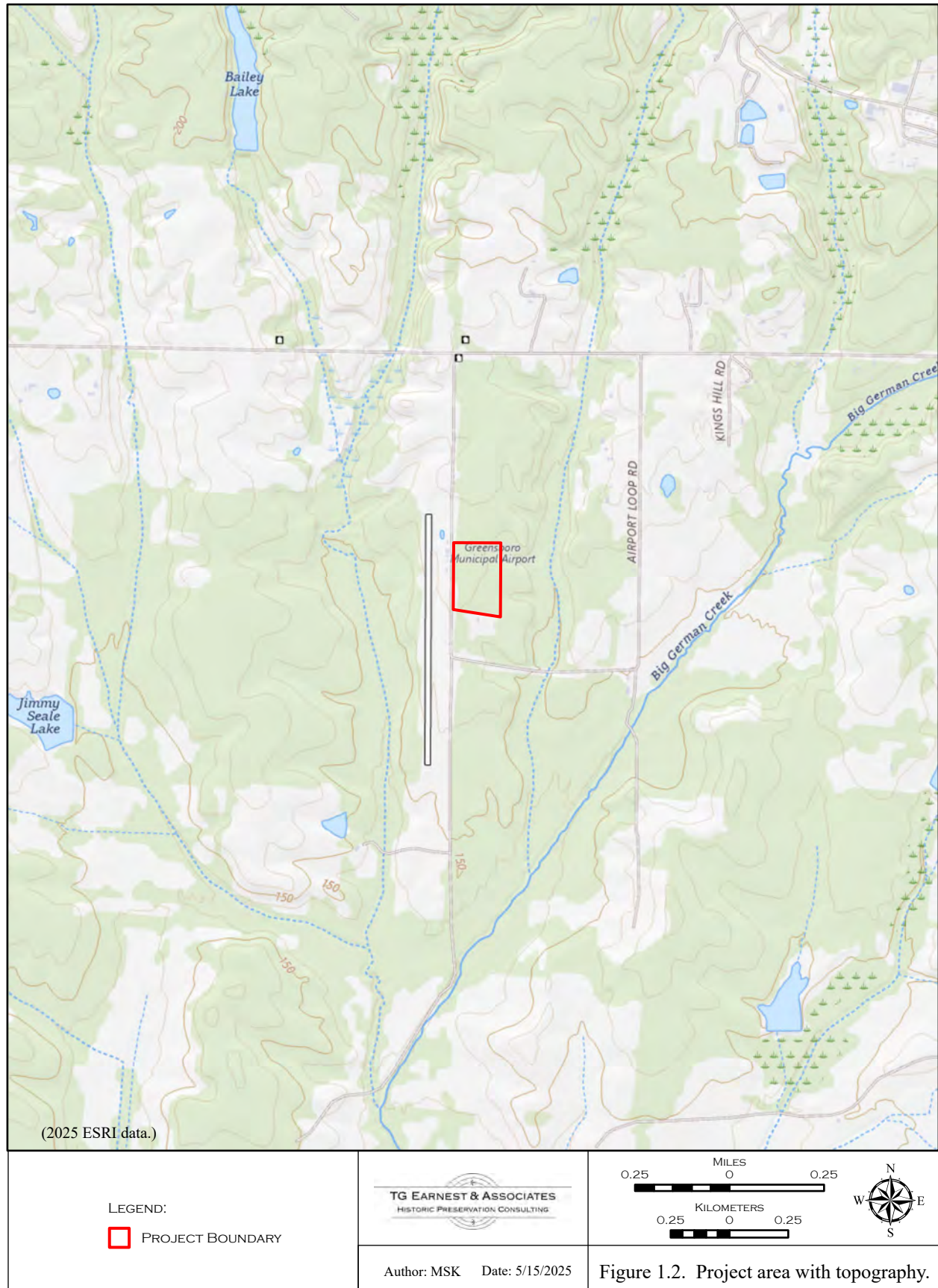
The physical area of potential effect (APE) consists of $\pm$ 21.0 acres located in Section 26, Township 20N, Range 4E, USGS *Melton, AL* quadrangle at an elevation of 150-170’ AMSL (Figures 1.2-1.3). The visual APE consists of adjacent parcels due to the nature of the proposed undertaking.

No historic properties were encountered within the physical APE. The existing airport control tower / administrative building is over 50 years of age (ca. 1963) but is considered NRHP ineligible and does not meet the criteria for consideration as an historic property or as a contributing property to an historic district. Consequently, assessment results indicate a finding of *no historic properties affected* is recommended appropriate for the proposed undertaking.

CRA of the Greensboro Airport Improvements Project, Hale County, Alabama



CRA of the Greensboro Airport Improvements Project, Hale County, Alabama





2.0 Environmental Setting

The project area is located in the Black Belt Prairie district of Alabama's East Gulf Coastal Plain physiographic section (Figure 2.1); the Black Belt Prairie is an area of rich, fertile black soils that extends from Mississippi to Georgia. The stratigraphy of the region is made up of a thin layer of rich black soil that lies atop the Selma group geological formation. The region is characteristic of low, flat plains (Geological Survey of Alabama, Map 168, *Physiographic Regions of Alabama*). Formation of the Coastal Plain was the result of eons of sea level changes and related erosion. The contemporary continental shelf was completely submerged 135 million years ago, with the Atlantic Ocean's beach stretching east to west across Georgia from Augusta to Macon to Columbus, and continued west across Alabama from Opelika to Tuscaloosa and north to Fayette and Russellville. This ancient beachhead is referred to as the Fall line due to the rapid decrease in elevation that resulted in significant waterfalls, shoals and rapids within streams and rivers. The Fall Line Hills serve as the southern boundary of the Piedmont before entering the Coastal Plain.

During the Cretaceous Period (135-68 million years ago), a decline in sea level occurred and the resultant erosion began to form the Coastal Plain (Lineback and Traylor 1973). The Coastal Plain is composed of loose gravel, sand and clay carried and redeposited by moving water from the Interior Highlands. A number of these sandy sediments have consolidated into rigid formations of sandstone and limestone. One of the most distinctive characteristics of the Coastal Plain sediments is the horizontal banding. These bands are tracts of different types of sediment that have been arranged in a sequence of belts parallel to the Fall Line. Sediment composition of these belts varies with the different rocks that were eroded. The surface of these sediment belts also varies according to the hardness of the underlying rock. Generally, soft rock is indicative of a low flat area while hard rock, such as quartzite, indicates hilly areas (Lineback and Traylor 1973).

The Coastal Plain slopes gradually (approximately two feet per mile) towards sea level, with a surface terraced by a sequence of primeval beachheads known as marine terraces. The exact number of these terraces is geologically debated but is generally placed between four and seven. These terraces occur in a descending order from the Fall Line to the present coastline. The edges of these marine terraces are very steep due to severe erosion during periods of lower sea level (Lineback and Traylor 1973).

Topography within the project area consists of an upland terrace that slopes gradually at the center of the project area from southeast to northwest. Vegetation within undeveloped areas consists primarily of planted pines with a hardwood mixed forest on the north edge and a cleared fire break south edge. In addition to the primary vegetation described, the site has grasses in various stages of growth, as well as a light underbrush in the form of horseweed and other leafy green plants. Mapped soils within the project area consisted entirely of Kipling clay loam, 1 to 5 percent slopes. This somewhat poorly drained soil forms on terraces and is formed from clayey marine deposits derived from chalk. A typical profile consists of Ap – 0 to 5 inches: clay loam, Bt – 5 to 18 inches: clay, Btss – 18 to 64 inches: clay, and Btkss – 64 to 80 inches: clay. Kipling clay loam does not have any minor components.

Observed soils were overall consistent with mapped descriptions, with clay subsoils encountered at the surface or within 15 cm across the entirety of the project area.

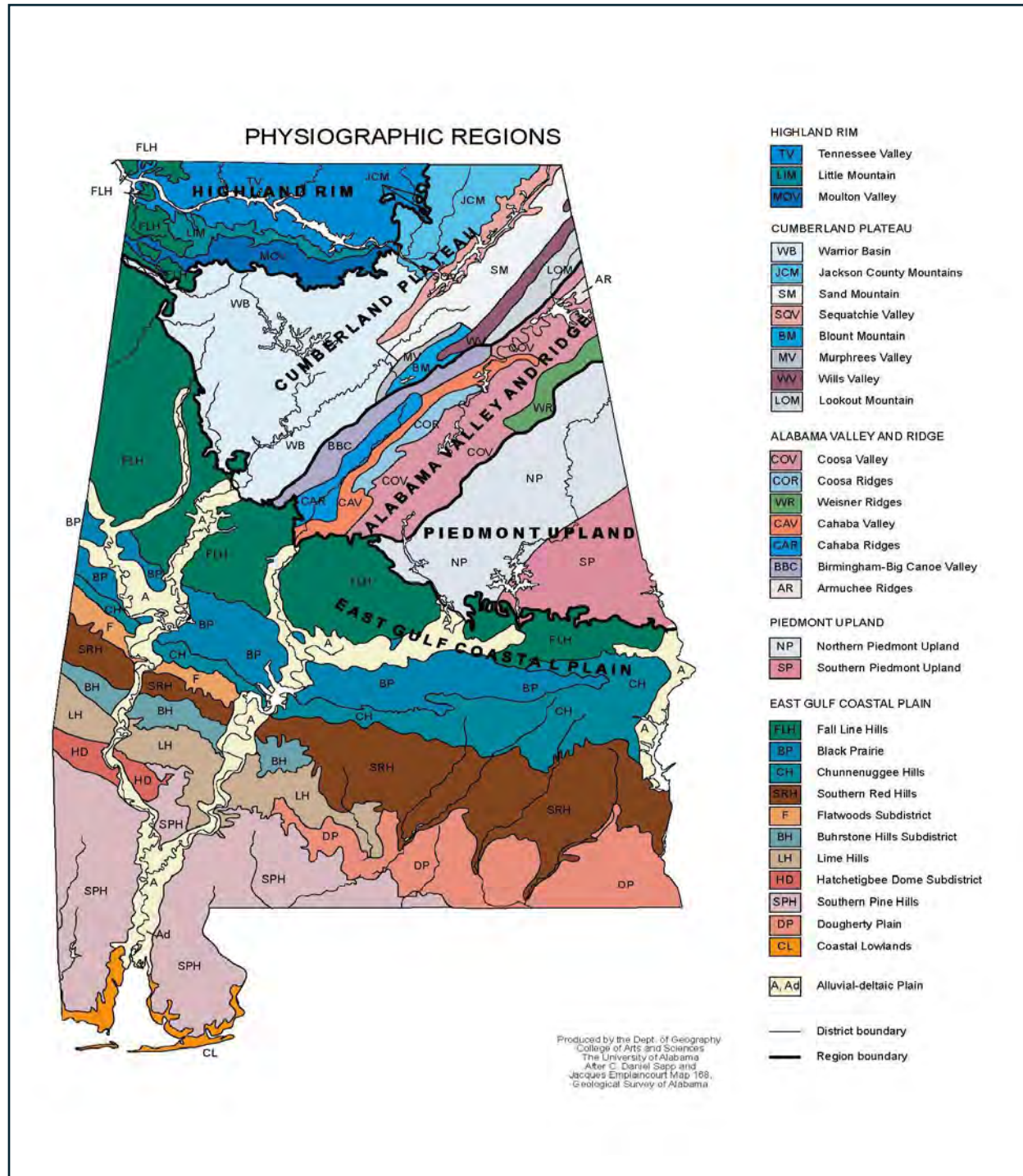


Figure 2.1. Physiographic regions of Alabama.



Figure 2.2. South view of western border of project area.



Figure 2.3. North view of typical conditions in northern portion of project area.



Figure 2.4. East view of southern portion of project area.

3.0 Literature and Document Search

Background research focused on examining Federal and State databases containing information regarding archaeological sites, historic structures, and historic properties within or near the study area, as well as research designed to provide a basic historical context for the study area within which results could be objectively quantified. In addition, historic maps were examined for depictions of historic roads, buildings, or structures within or near the project area.

State databases containing archaeological site locations are only accessible by historic preservation professionals with qualifications that meet or exceed SOI standards. Archaeological site locations from such sources are considered confidential and not for public distribution, with exclusive use limited to the Client and designated representatives.

A historic property (or NRHP eligible resource) is defined in the National Historic Preservation Act of 1966 (NHPA) (54 U.S.C. § 300308) as any “prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion on, the National Register of Historic Places, including artifacts, records, and material remains related to such a property or resource.”

There are five (5) categories of historic properties (or cultural resources) that are used to help determine eligibility for the NRHP. These include object, site, building, structure, and district. Once a category has been identified, then it must possess significance and integrity, and meet one or more of the four (4) criteria for listing on the NRHP. The criteria for evaluation, according to the NRHP 36 Code of Federal Regulations (CFR) 60.4, must satisfy at least one of the following Eligibility Criteria:

- **Criterion A** - association with events that have made a significant contribution to the broad patterns of our history; or
- **Criterion B** - association with the lives of persons significant in our past; or
- **Criterion C** - embodiment of distinctive characteristics of a type, period, or method of construction, or represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- **Criterion D** - having yielded, or likely to yield, information important in prehistory or history.

Once a property meets one or more eligibility criteria, the next test for eligibility involves evaluating integrity. Integrity is the ability of a property to convey its significance in regards to eligibility criteria. There are seven aspects of integrity for evaluating significance: *Location, Design, Setting, Materials, Workmanship, Feeling, and Association*. NRHP eligibility is not possible without integrity, and a historic property must meet one or more of the seven aspects to be considered NRHP eligible. The presence of cultural resources alone does not necessarily impede a project unless specific conditions are met as described above.

3.1 Research Findings

The following summary provides an overview of background research results for the project area:

- *National Register of Historic Places (NRHP)*: no listings within or adjacent to the project area.
- *Alabama Register of Landmarks and Heritage*: no listings within or adjacent to the project area.

Alabama Archaeological Site File (ASSF): no previous surveys or archaeological sites are recorded within one mile of the project area. The closest survey to the project area is “*A Cultural Resources Survey for a Proposed Borrow Pit in Hale County, Alabama*” (Oakley 1989). This survey is located approximately 1.5 miles east of the project area. The survey covered just under 1 acre and was conducted in 1989, with no cultural resources discovered as a result.

Historic Map and Imagery Search

Historical maps and aerials available online were consulted for identifying cultural resources within the project area. USDA soil survey maps typically depict buildings, structures and cemeteries, while USGS topographic maps provide useful data on internal road networks and the location of cemeteries and structures when present. Alabama Highway Department (AHD) maps typically provide road networks and very generalized structure locations.

- 1833 Land Surveyors Plat: no roads or significant resources are depicted.
- Snedecor's Map of Hale County, Alabama, 1870: no structures or resources are depicted within or adjacent to the project area.
- 1909 *Hale County soil survey map*: no structures or resources are depicted within or adjacent to the project area.
- 1931 *Hale County soil survey map*: no structures or resources are depicted within or adjacent to the project area.
- 1937 AHD map (Figure 3.1): depicts one structure (school building) directly adjacent to the project area; numerous structures are depicted to the north on Millwood Road. The presumed school is not depicted on subsequent AHD maps indicating that the building was removed and perhaps short-lived.
- 1949 AHD map (Figure 3.2): no structures are depicted directly adjacent to the project area; many structures are depicted on Millwood Road.
- 1976 AHD map (Figure 3.3): the Greensboro Municipal Airport is now depicted west of the project area; several structures are depicted north and northeast of the project area.
- 1980/1986 USGS *Melton, AL quadrangle* (Figure 5.1): one structure is depicted within the northeastern portion of the project area. This presumed shed is not depicted on aerial photographs and unlikely to be associated with the school depicted in this location on the 1937 AHD map. No associated driveway is present on aerial photographs.

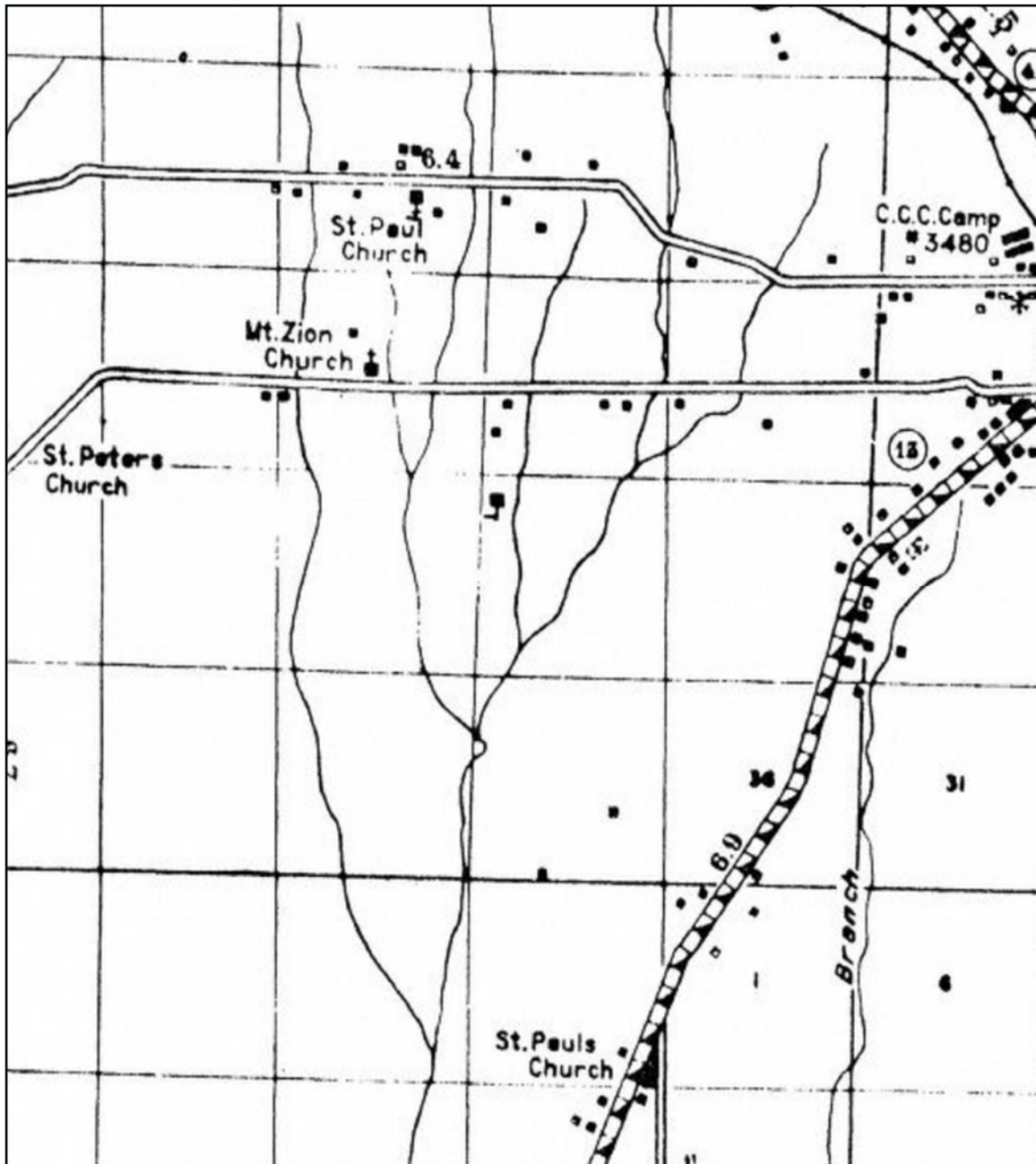


Figure 3.1. 1937 AHD map.

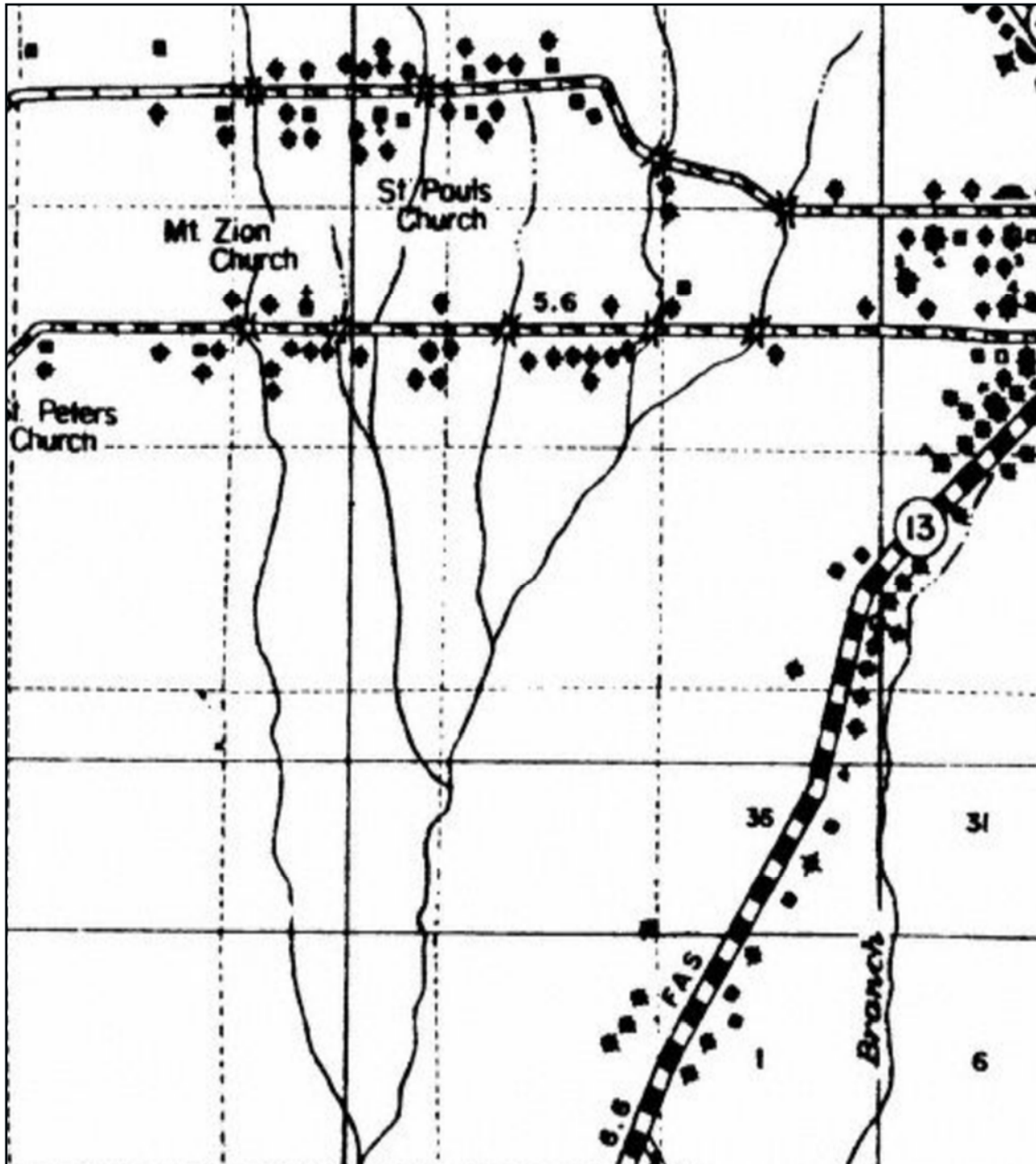


Figure 3.2. 1949 AHD map.

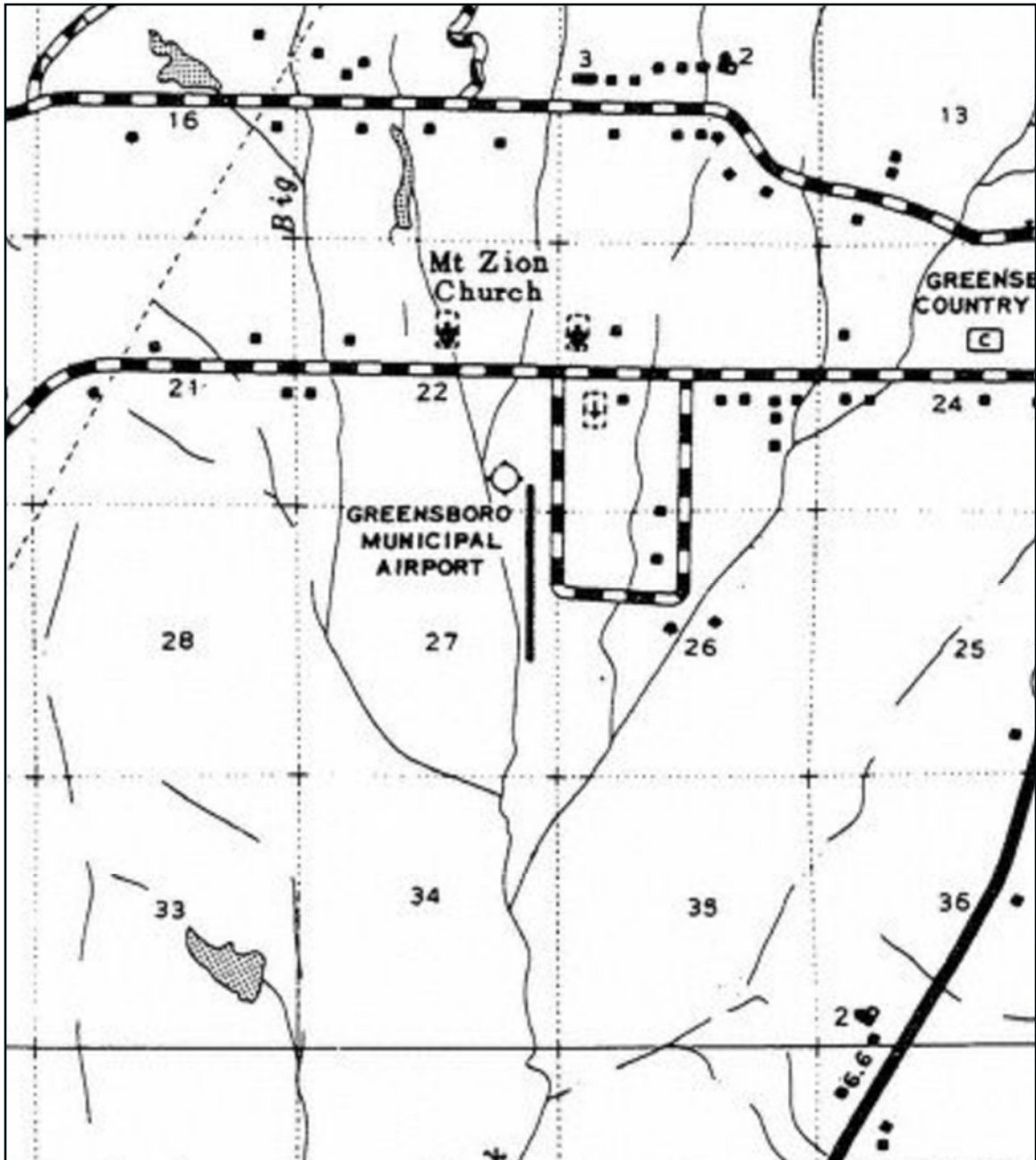


Figure 3.3. 1976 AHD map.

4.0 Field Methods

Primary research goals focused on locating evidence of surficial cultural resources and subsurface cultural strata, and, in the event cultural resources were encountered, determining archaeological site depth, horizontal extent, and general cultural chronology. Testing methods employed followed the guidelines set forth within the Alabama Historical Commission's *Standards and Guidelines for Survey and Testing within the State of Alabama* and Federal guidelines as per *The Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation* (48 FR 44716).

Initial evaluation consisted of a pedestrian walkover of the physical APE for evidence of historic structures, historic ornamental vegetation, midden, and other surficial evidence of cultural resources. This initial inspection also evaluated existing conditions such as soil drainage characteristics, historic land alterations, and the presumed viability of natural water sources. Defining general probability areas and an appropriate testing strategy based on topography, soils, and water sources was a key goal of the preliminary property evaluation. Survey sub-areas were established within the project area boundaries to facilitate spatial control of field data and field crew deployment coordination, with sub-area boundaries based on internal road networks and natural features.

The entire extent of the project was sufficiently tested through rigorous surface examination and systematic shovel testing, with particular attention given to areas of high probability based on historic maps and aerial photos. Sixty-four shovel tests measuring 30-x-30 cm were conducted at 30-meter intervals as allowed by impacts from planted pine row establishment. Tests were also located judgmentally depending on elevation, soils, and previous disturbance in order to improve survey coverage. Excavated soils were sifted through portable screens composed of 1/4-inch hardware cloth. All shovel tests were excavated to a depth of culturally sterile subsoils and backfilled upon completion. Representative photographs of topography and vegetation are depicted herein. Existing conditions and survey methods provided ample opportunity for discovering cultural resources.

Historic structures were documented and evaluated according to the guidelines established in *Alabama Guidelines: Preparing Reports for Historic Architectural Resources for Section 106 Review* and the applicable National Register criteria. Representative photographs are depicted herein. Existing conditions and survey methods provided ample opportunity for discovering cultural resources. Had human remains been encountered, all investigations would have immediately ceased, followed by notification of the proper authorities. Investigations would not have resumed unless specifically authorized by the district medical examiner or State Archaeologist.

5.0 Results

5.1 Physical APE

No cultural resources were discovered on the surface or from subsurface testing. Surface visibility was impeded to varying degrees by ground cover, but sufficient exposed soils were present to detect surficial evidence of historic resources had such been present. Shovel tests depicted a typical stratigraphy of brown clay subsoils at the surface or within 20 cm. No evidence of a structure as depicted on the contemporary USGS topographic map was observed, nor was any driveway present along the adjacent highway.

5.2 Visual APE

One historic structure is located west and adjacent to the project area within the Greensboro Municipal Airport boundaries. The Greensboro Municipal Airport Administrative Building/Control Tower was constructed in 1963 and is part of the original airport. The airport was constructed during a period of regional aviation transportation planning. Nearby airports also constructed in the early 1960s included Marion, Eutaw, Aliceville, Uniontown and York.

The two-story concrete block rectangular building has a low pitch side gable metal v crimp roof with rafter tails and single aluminum awning windows. The roof has been replaced and a metal antenna is attached to one corner. Other than these alterations, the building retains all seven aspects of integrity - location, design, workmanship, materials, feeling, setting and association. Additionally, it continues its original function.

However, the Masonry Vernacular building does not qualify for listing under National Register Criterion C for Architecture as it does not embody the distinctive characteristics of a type, period, or method of construction, or represent the work of a master, or possess high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction. It also does not qualify under Criterion A for association with events that have made a significant contribution to the broad patterns of our history or Criterion B for association with the lives of persons significant in our past.

Other buildings adjacent to the project area near the Airport Administrative Building/Control Tower consist of two contemporary enclosed metal hangars, one open five bay metal pole hangar, one small concrete block utility structure and a large metal fuel tank. None are known to be 50 years old or older. All structures are located near the airport entrance gate with a large fuel tank and concrete air strip surrounded by woods.

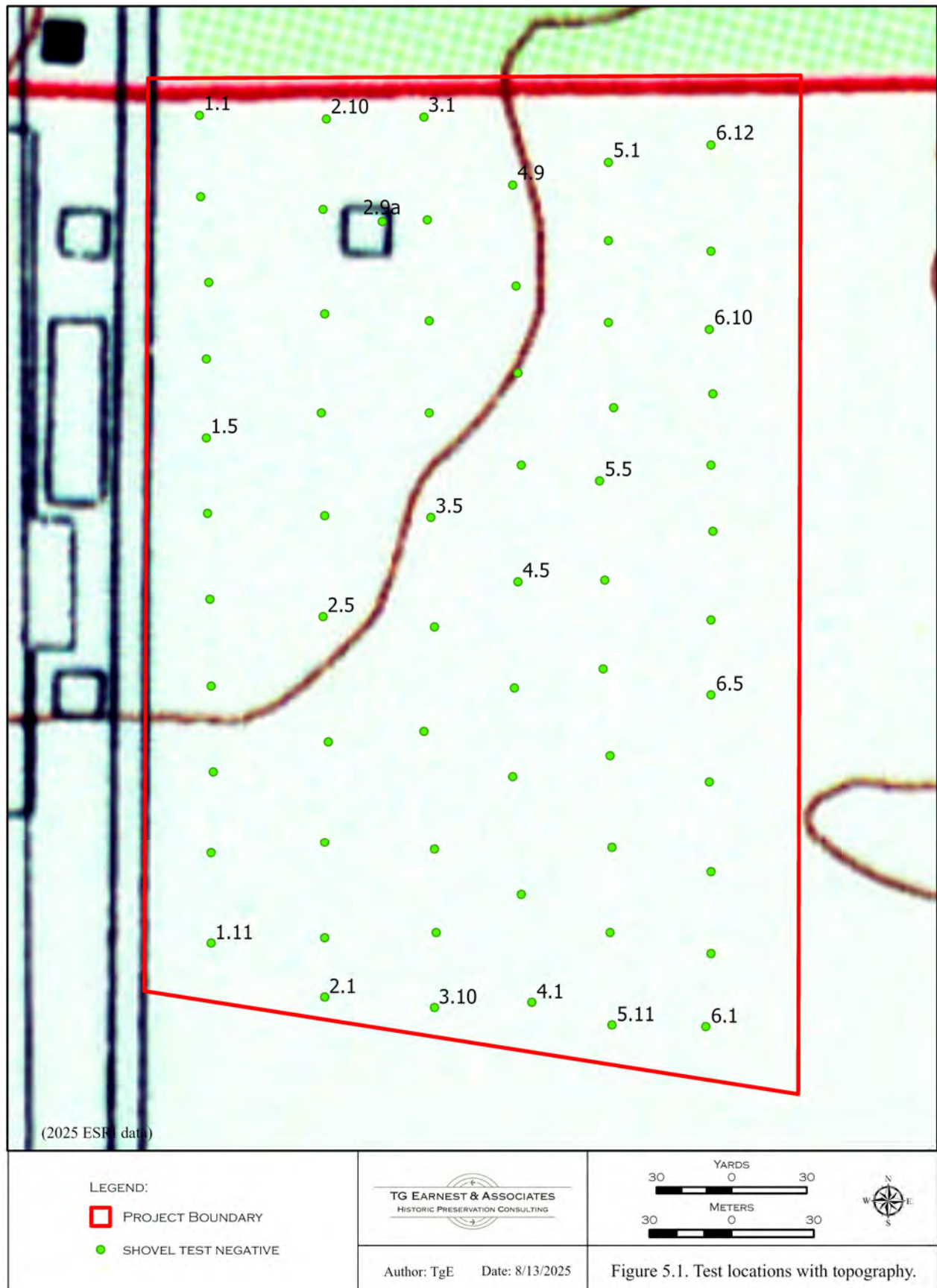






Figure 5.3. Northwest view at airport office.



Figure 5.4. East elevation at airport office.



Figure 5.5. Southwest view of airport with ancillary building in foreground.



Figure 5.6. Northwest view of enclosed hangars.



Figure 5.7. West view at open hangars.

6.0 Laboratory Methods and Collection Curation

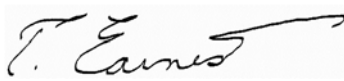
No cultural material was encountered on the surface or from shovel tests. Associated field notes, photographs, and a copy of the report will be associated with Troy University. Electronic copies of photographs are included herein.

7.0 Conclusions and Recommendations

Literature and document research results indicated the presence of a single structure coded as a school within the northeastern portion of the project area, and a potentially modern shed or small building is also depicted on the 1986 USGS topographic map. No evidence of a structure was observed within the project area, and no remanent driveway exists in this area. All shovel tests were negative for cultural material. Shovel testing and visual inspection provided ample opportunities for locating cultural material had evidence of such been present.

Regarding the visual APE, one historic structure was evaluated within the adjacent Greensboro Municipal Airport property. The concrete block administrative building/control tower was evaluated as NRHP ineligible in regards to all applicable eligibility criteria. Other airport buildings are of indeterminate antiquity, but would also be evaluated as NRHP ineligible if indeed over 50 years of age. Assessment results indicate the proposed undertaking will have *no effect upon historic properties* and should be allowed to proceed with no further archaeological investigations.

While the presence of human remains is unlikely, in the event of discovery of human remains within the project area, any activities that may disturb such remains should immediately cease and the provisions of the Alabama Burial Act (Code of Alabama 1975, §13A-7-23.1, as amended; Alabama Historical Commission Administrative Code Chapter 460-X-10 Burials) should be followed. Construction should not proceed unless specifically authorized by the district medical examiner or the State Archaeologist.



Tray G. Earnest, RPA
President
TG Earnest and Associates

08/15/2025

Date

Eric Tomasovic
Environmental Protection Specialist
JAN ADO
Federal Aviation Administration

Date

References

Encyclopedia of Alabama

2020 *Cumberland Plateau Physiographic Region*.

<http://www.encyclopediaofalabama.org/article/h-1301>

Lineback, Neal G. and Charles T. Traylor

1973 *Atlas of Alabama*. The University of Alabama Press.

National Register of Historic Places

2025 <https://npgallery.nps.gov/NRHP/> . Accessed 3/15/2025.

Oakley, C. Brand

1989 *A Cultural Resources Survey for a Proposed Borrow Pit in Hale County, Alabama*.

University of Alabama, Moundsville AL. ASF Survey no. 4,052,151.

University of Alabama

2025 <http://alabamamaps.ua.edu/historicalmaps/counties/Hale/Hale.html>. Accessed 05/15/2025.

University of Alabama

2025 <https://alabamamaps.ua.edu/aerials/Counties/Hale/Hale.html>. Accessed 05/15/2025.

USDA, Web Soil Survey

2025 <http://websoilsurvey.nrcs.usda.gov/app/HomePage.htm>. Accessed 3/15/2025.

U.S. Department of the Interior Geological Survey

1953 Montgomery Quadrangle. USGS Historical Topographic Division, Map. Retrieved from Living Atlas, <https://livingatlas.arcgis.com/topoexplorer/>.

Appendix A
Resumes of Qualified Professionals

Tray G. Earnest, RPA

T.G. EARNEST & ASSOCIATES

Experience: **President, Principal Investigator**
TG Earnest and Associates 2010 – present
Providing due diligence property review, cultural resource management and historic preservation consulting throughout the Southeast.

Principal Investigator

Garlick Environmental Associates, Inc.- 8/2002 to 3/2010

- ❖ Phase I Cultural Resource Assessment
- ❖ Phase II/Mitigation of Southeastern Prehistoric and Historic Archaeological Sites
- ❖ Environmental Permitting, FDEP/ACOE
- ❖ Phase I Environmental Site Assessment
- ❖ Ecological Assessment/ Development Feasibility Assessment
- ❖ GPS Mapping
- ❖ Wetland Delineation, FDEP/ACOE
- ❖ NEPA Site Assessment
- ❖ FCC Communications Tower Review

Project Manager 1992-2002

Troy State University 1992 to 1997, 1999 to 2002

- ❖ Highway, Pipeline, and Transmission Line Assessment, ALDOT and Private Entities
- ❖ Block Acreage Assessments, ACOE, DOD and Private Entities
- ❖ Phase II/Mitigation of Southeastern Prehistoric and Historic Archaeological Sites

Adjunct Instructor 2000 – 2002

- ❖ Troy State University, Department of Criminal Justice and Sociology

Ethnographer – 1998

- ❖ Bureau of Applied Research in Anthropology, University of Arizona

Field Technician – 1990-1992

- ❖ Troy State University, Various Projects

Education: **MA, Applied Anthropology – 2004**
University of South Florida, Tampa, Florida

Bachelor of Arts, Social Science/Historic Preservation, 1991

Troy State University, Troy, Alabama

ACOE Wetland Delineation Training, 2004

FDEP Wetland Plants Training, 2005

FDEP Advanced Wetland Soils Training, 2006

FDEP Wetland Delineation Training 2008

Affiliations: **Register of Professional Archaeologists, Pike County Chamber of Commerce**



Laura Lee Corbett Consulting

Historic Preservation and Downtown Revitalization

1422 Devils Dip, Tallahassee, FL 32308 • Ph: 850.264.4611 • fax: 850.597.7759 • LCorbett@earthlink.net



Laura Lee Corbett offers a variety of historic preservation services with an emphasis on cultural resource management, community revitalization and not-for-profit development.

As a professional architectural historian and historic preservationist, Corbett exceeds the Secretary of the Interior's professional qualifications standards. She assists private sector clients to comply with various cultural resource laws in development projects. Experienced in handling Section 106 or Federal undertakings, Developments of Regional Impact and local regulations, she also provides technical assistance to Certified Local Governments. As a FEMA Reservist, Corbett provided more than a decade of service to fulfill the agency's legal responsibilities under various historic preservation laws, Executive Orders and environmental regulations.

Awards & Appointments

Florida Preservation Award in Education/Media & Organizational Achievement

FL Trust for Historic Preservation, 2021
Goodwood Museum and Gardens

Board Member, 2015-current
Leon County Time Capsule Committee

County Commission Appointment, 2013
Florida Chamber Foundation Caucus System
Caucus Member, 2010 - 2012

Tallahassee Trust for Historic Preservation
Chair, 2008-2010; V.P. 2006-2008

Florida Preservation Award in Education/Media
FL Trust for Historic Preservation, 2009
School of Building Arts Advisory Board, SCAD
Board Member, 2005-2008

Jacksonville Historic Preservation Commission
Mayoral Appointment, 1997

Education

MFA, Architectural History
Savannah College of Art and Design, 1997

BFA, Historic Preservation, Interior Design
Savannah College of Art and Design, 1995

Services and capabilities

Annual board retreat & work plan facilitation
Grant writing & administration
Identification of funding sources
Archival and historical research
National Register assessment and nomination
Historic property survey and documentation
Preservation planning & incentives
Study and treatment of historic cemeteries
NEPA/NHPA Section 106 compliance
Land records research
Military resource experience
Linear historic resource experience
Museum education
Disaster mitigation
Native American Tribal consultation

Clients

1000 Friends of Florida
Camp Gordon Johnston Association
Alonzo "Jake" Gaither House Museum
Creech Engineering
Crestview Main Street & CRA
City of Chattahoochee, FL
Chattahoochee Main Street
EDGE District, St. Petersburg, FL
Environmental Consulting & Technology (ECT)
Episcopal Diocese of Florida
Federal Emergency Management Agency (FEMA)
Florida State University (FSU), Adjunct Professor
Florida Department of State
Fort Pierce Main Street
Gainesville Community Redevelopment Agency
Garlick Environmental Associates, Inc.
Havana Main Street
Hardeman-Kempton and Associates
Inovia Consulting Group
Kissimmee Main Street
Lincoln Park Main Street (Fort Pierce, FL)
Main Street of Monticello
Martin County Historic Preservation Board
Melbourne Main Street
Moore Bass Consulting, Inc.
Old Palm Harbor Main Street
Panama City Community Redevelopment Agency
PBS&J Engineering
St. Cloud Main Street
St. John's & St. Philips Episcopal Churches
T. G. Earnest & Associates
Theresa Schober, RPA
Thomasville Landmarks, Inc.
Vilano Beach Town Center Program

9.0 Appendix B

Curation Agreement

Troy, Alabama
36082

334-670-3000

February 24, 2025

Tray G. Earnest
TG Earnest & Associates
207 N. Oak St.
Troy, AL 36081

Dear Tray,

As per your request, this letter is to confirm our standing agreement with you to provide curation services to TG Earnest & Associates on an as-needed basis. As you know, we are recognized by a variety of Federal agencies as a repository meeting the standards in 36 CFR Part 79 and have formal agreements to provide curation under these guidelines to multiple federal agencies such as the Army National Guard and Natural Resources Conservation Service.

Please be advised that once a year we must be notified of all reports in which we were named as the repository. Project collections must be submitted within one calendar year of completion. Small projects may be complied for periodic submission. The AHC survey policy specifies which materials must be curated (Administrative Code of Alabama, Chapter 460-X-9). Renewal of this agreement is contingent upon compliance.

We appreciate this opportunity to be of assistance and look forward to working with you in the future.

Sincerely,



Stephen Carmody, Director
Archeological Research Center
Troy University
(334)808-6771



Appendix C



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, MOBILE DISTRICT
600 VESTAVIA PARKWAY, SUITE 203
THE SHELBY BUILDING
VESTAVIA HILLS, AL 35216

September 8, 2025

North Branch
Regulatory Division

SUBJECT: Department of the Army, No Permit Required, File Number SAM-2020-00339-JDC, Greensboro Municipal Airport – land acquisition, Hale County, Alabama

Greensboro Municipal Airport
% Goodwyn Mills Cawood, LLC
Attention: Mr. Stuart Blackwell
2400 5th Avenue South, Suite 200
Birmingham, Alabama 35233

Transmitted electronically to stuart.blackwell@gmcnetwork.com

Dear Mr. Blackwell:

This is in response to your submission dated September 3, 2025, requesting Department of Army (DA), U.S. Army Corps of Engineers (USACE) re-evaluation of a previously issued jurisdictional determination for a 14.15-acre addition to the Greensboro Municipal Airport as depicted on the attached maps. The review area is located in Section 26, Township 20 North, Range 4 East, centered near latitude 32.683766 North, longitude -87.65941487 West in Greensboro, Hale County, Alabama. This project will continue to be evaluated under previously assigned file number SAM-2020-00339-JDC, which should be referenced in all future correspondence regarding this project.

Based on our desktop review of the information you provided and other publicly available mapping resources, we have determined the 14.15-acre parcel addition to Greensboro Municipal Airport consists of a non-jurisdictional dry land area that does not contain federally regulated wetlands or other waters of the United States (U.S.) and is not subject to our Federal permitting authority. You should note that this determination is primarily based upon the information submitted by you and/or your consultant, and that you are ultimately responsible for its accuracy.

The parcel was reviewed pursuant to Section 404 of the Clean Water Act, which requires that a DA permit be obtained for the placement or discharge of dredged and/or fill material into "waters of the United States", including wetlands, prior to conducting the work (33 U.S.C. 1344). For regulatory purposes, the USACE defines wetlands as

those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions.

This letter contains an approved jurisdictional determination (JD) for the subject parcel. If you object to this determination, you may request an administrative appeal under USACE Regulations at 33 CFR Part 331. Attached you will find a Notification of Appeal Process (NAP) fact sheet and Request for Appeal (RFA) form. If you request to appeal this determination you must submit a completed RFA form to the USACE, South Atlantic Division Office at the following address:

Acting Regulatory Review Officer
Attention: Ms. Jessica Comeaux
CESAD-PDS-O
60 Forsyth Street Southwest, Floor M9
Atlanta, Georgia 30303-8803
Jessica.C.Comeaux@usace.army.mil

In order for an RFA to be accepted by the USACE, the USACE must determine that it is complete, that it meets the criteria for appeal under 33 CFR Part 331.5, and that it has been received by the Division Office within 60 days of the date of the NAP. Should you decide to submit an RFA form, it must be received at the above address by **November 7, 2025**. It is not necessary to submit an RFA form to the Division Office if you do not object to the determination in this letter.

This approved JD is based on current policy and regulation and is valid for a period of five (5) years from the date of this letter. If by the end of the five-year period any proposed work has not been implemented and this JD has not been specifically revalidated by the USACE, it shall automatically expire.

The statements contained herein do not convey any property rights or any exclusive privileges, and do not authorize any injury to property nor shall it be construed as excusing you from compliance with other Federal, State, or local statutes, ordinances, or regulations that may affect proposed work at this site. Furthermore, the delineation included herein has been conducted to identify the location and extent of the aquatic resource boundaries and/or the jurisdictional status of aquatic resources for purposes of the Clean Water Act for the particular site identified in this request. This delineation and/or jurisdictional determination may not be valid for the Wetland Conservation Provisions of the Food Security Act of 1985, as amended. If you or your tenant are U.S. Department of Agriculture (USDA) program participants, or anticipate participation in USDA programs, you should discuss the applicability of an NRCS certified wetland determination with the local USDA service center, prior to starting work.

If you intend to sell property that is part of a project that requires DA authorization, it may be subject to the Interstate Land Sales Full Disclosure Act. The Property Report,

required by Housing and Urban Development Regulation, must state whether or not a permit for the development has been applied for, issued, or denied by the USACE, (Part 320.3(h) of Title 33 of the Code of Federal Regulations).

Based on our findings regarding the 14.15-acre parcel, a **DA permit pursuant to Section 404 of the Clean Water Act will not be required** to conduct work on the property. However, if the location or scope of work changes, the Greensboro Municipal Airport is urged to contact this office for a verification of this determination.

We appreciate your cooperation with the USACE Regulatory Program. Please refer to file number **SAM-2020-00339-JDC** in all future correspondence regarding this project. You may contact me at leslie.e.turney@usace.army.mil or at (205) 213-9623 if you have questions concerning this matter. For additional information about our Regulatory Program, visit our website at www.sam.usace.army.mil/Missions/Regulatory.aspx. Also, while you are there, please take a moment to complete our regulatory customer survey located along the right side of the webpage. Your responses are appreciated and will help us improve our services.

Sincerely,

Leslie E. Turney
Chief, North Branch
Regulatory Division

Attachments

Appendix D



Goodwyn Mills Cawood

PO Box 242128
Montgomery, AL 36124

T (334) 271-3200
F (334) 272-1566

www.gmcnetwork.com

April 21, 2025

Mr. Bill Pearson
Field Supervisor
U.S. Fish and Wildlife Service
1208-B Main Street
Daphne, AL 36526

MD



RE: Greensboro Municipal Airport (7A0)
Airport Capital Improvement Plan
Project Code: 2025-0056358
Hale County, Alabama

Dear Mr. Pearson:

Goodwyn Mills Cawood, LLC (GMC), on behalf of the City of Greensboro, is seeking concurrence under Section 7 of the Endangered Species Act (ESA). GMC is in the process of performing an environmental review pursuant to the National Environmental Policy Act (NEPA). An Environmental Assessment is being prepared to assist decision makers with the Federal Aviation Administration (FAA) in evaluating the potential impacts of the proposed Airport Capital Improvement Plan, which includes a new apron area, hangar building, and perimeter fencing at the Greensboro Municipal Airport.

The Greensboro Airport, located in Greensboro, Hale County, Alabama are approximately ±86.00 acres. Of the 86 acres, approximately ± 14.15 acres located on the east side of Airport Loop Road are proposed to be developed. This project area is within Section 26, Township-20 N, Range-4-East. The project center coordinates are latitude 32.68412°N, 87.65975°W

The City of Greensboro intends to make improvements to the existing Greensboro Municipal Airport terminal with a new apron area, hangar building, and perimeter fencing, located within the 14.5 acres. This would improve the runway to parallel taxi lane separation and runway to parking area distance, which is currently inadequate for FAA standards. The proposed project would comply with the design standards set forth in FAA AC 150/5300-13A Change 1 Airport Design, accommodating the existing demand and airport development. The project also includes the closing of a portion of Airport Loop Road for access to the proposed terminal area. This planned development was evaluated and accepted by Greensboro Municipal Airport and is depicted on the current FAA-approved Airport Capital Improvement Plan. The attached figures depict the location of the project study area.

According to the U.S. Fish & Wildlife Service (USFWS) Environmental Conservation Online System (ECOS), accessed February 13, 2025, the endangered and threatened species that may occur within the project study area include:

Group	Common Name	Scientific Name	Status
Mammals	Tricolored Bat	<i>Perimyotis subflavus</i>	Proposed Endangered
Reptiles	Alligator Snapping Turtle	<i>Macrochelys temminckii</i>	Proposed Threatened
Clams	Inflated Heelsplitter	<i>Potamilus inflatus</i>	Threatened



Insect	Monarch Butterfly	<i>Danaus plexippus</i>	Proposed Threatened
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There are no critical habitats within the project area.

Tricolored Bat (*Perimyotis subflavus*)

The tricolored bat is a species of microbat native to eastern North America. It is the smallest bat species in the eastern and midwestern US, with individuals weighing only 4.6–7.9 g. In the summer, females roost in small groups and males roost solitarily in tree foliage or beard lichen. Trees used for this purpose include oak, maple, the eastern cottonwood, and American tulip tree. In the winter, the tricolored bat hibernates in mines, caves, or other human structures. The site consisted of dense, naturally regenerating areas of pine. No potential hibernacula were noted within the property. Due to the lack of hibernacula and the fragmentation of the forested areas, it is GMC's opinion that the site does not contain suitable habitat for the Tricolored Bat.

Alligator Snapping Turtle (*Macrochelys temminckii*)

The Alligator Snapping Turtle is primarily found in freshwaters of the southeastern US. They are typically found in bodies of water that drain into the Gulf of Mexico and usually do not occur in isolated wetlands or ponds. They prefer deep pools in places with canopy cover, overhanging trees, shrubs, dead submerged trees, and beaver dens. The site consisted of dense, naturally regenerating areas of pine; therefore, it is GMC's opinion this site does not provide suitable habitat for the alligator snapping turtle.

Inflated Heelsplitter (*Potamilus inflatus*)

The preferred habitat of this species is soft, stable substrates in slow to moderate currents (Stern 1976). It has been found in sand, mud, silt and sandy gravel, but not in large gravel or armored gravel (Hartfield 1988). It is usually collected on the protected side of bars and may occur in depths over 20 feet. The occurrence of this species in silt may not indicate that the life cycle can be successful in that substrate (Hartfield 1988). Adult mussels may survive limited amounts of silt where juveniles would suffocate. The occurrence of this species in silt may be because it was established prior to deposition of the silt. The site consisted of dense, naturally regenerating areas of pine; therefore, it is GMC's opinion this site does not provide suitable habitat for the listed clam.

Monarch Butterfly (*Danaus plexippus*)

The adult monarch butterfly is a large butterfly with bright orange wings surrounded by a black border and covered with black veins. Monarchs lay eggs on their obligate milkweed host plant and larvae emerge after two to five days. The milkweed plant prefers full sunlight and grows best in opens areas with well drained soils. No milkweed plants were observed on the property during the site visits. The site consisted of dense, naturally regenerating areas of pine; therefore, it is GMC's opinion the proposed project will not have an adverse effect on the Monarch Butterfly.

GMC Biologists completed a site evaluation within the project area on March 14, 2025, and February 27, 2025 there were no wetlands or streams identified within the project boundary. The proposed improvements as mentioned above are located within the 14.5 acres of dense, naturally regenerating areas of pine, therefore, it is GMC's opinion that none of the species listed above or their habitat will be impacted by the proposed project



We would appreciate a response as soon as possible. If you need any further information or wish to discuss this project, please let us know. To help expedite the review process, your response can be e-mailed to sherri.groghan@gmcnetwork.com.

Sincerely,
GOODWYN MILLS CAWOOD, LLC

Sherri Groghan, CNRP
Environmental Scientist



U.S. Fish and Wildlife Service
1208-B Main Street – Daphne, Alabama 36526
Phone: 251-441-5181 Fax: 251-441-6222

No federally listed species/critical habitat are known to occur in the project area. As described, the project will have no significant impact on fish and wildlife resources. IF PROJECT DESIGN CHANGES ARE MADE, PLEASE SUBMIT NEW PLANS FOR REVIEW. We recommend use of best management practices specific to your project (See <https://www.fws.gov/project/best-management-practices-alabama>).

William J. Pearson
Field Supervisor
Alabama Ecological Services Field Office

MAY 02 2025

Date

3

May 28, 2020

Goodwyn Mills Cawood, LLC
Sherri Groghan, CNRP, Environmental Scientist
sherri.groghan@gmcnetwork.com

Re: Greensboro Municipal Airport (A70) Airport Capital Improvement Plan Project - Hale County, Alabama

Sherri Groghan,

This letter is in response to a request for comment on Greensboro Municipal Airport (A70) Airport Capital Improvement Plan project *Hale County, AL*. This project is *construction of a new minor secondary structures* and is therefore exempt from the Farmland Protection Policy Act (FPPA) per activities listed below:

Activities not subject to FPPA include:

- * Federal permitting and licensing
- * Projects planned and completed without the assistance of a Federal agency
- * Projects on land already in urban development or used for water storage
- * Construction within an existing right-of-way purchased on or before August 4, 1984
- * Construction for national defense purposes
- * Construction of on-farm structures needed for farm operations
- * Surface mining, where restoration to agricultural use is planned
- * Construction of new minor secondary structures such as a garage or storage shed.

In addition:

“Only assistance and actions that would convert farmland to nonagricultural uses are subject to this Act. Assistance and actions related to the purchase, maintenance, renovation, or replacement of existing structures and sites converted prior to the time of an application for assistance from a Federal Agency, including assistance and actions related to the construction of minor new ancillary structures (such as garages or sheds), are not subject to the Farmland Protection Policy Act.”

NRCS primary concern is the possible conversion of prime farmland. Erosion and sediment control measures should be implemented and maintained during the construction phase to protect natural resources. However, construction activities near and across water bodies could be a Clean Water Act violation. Therefore, contacting your local Army Corps of Engineers representative is suggested on projects where it may be applicable.

Erosion and sediment control measures should be implemented and maintained during the construction phases of this project to protect land, water, and other related resources. Plans for construction should include sediment basins/traps and other erosion control practices, including coverage of bare soil as soon as possible by temporary/permanent vegetative and/or physical structures. If you have any questions, contact me at 334-530-0108 or dandre.yancey@usda.gov.

Thanks in Advance,

D'andre Yancey
Resource Soil Scientist
USDA-NRCS Alabama



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, MOBILE DISTRICT
600 VESTAVIA PARKWAY, SUITE 203
THE SHELBY BUILDING
VESTAVIA HILLS, AL 35216

September 8, 2025

North Branch
Regulatory Division

SUBJECT: Department of the Army, No Permit Required, File Number SAM-2020-00339-JDC, Greensboro Municipal Airport – land acquisition, Hale County, Alabama

Greensboro Municipal Airport
% Goodwyn Mills Cawood, LLC
Attention: Mr. Stuart Blackwell
2400 5th Avenue South, Suite 200
Birmingham, Alabama 35233

Transmitted electronically to stuart.blackwell@gmcnetwork.com

Dear Mr. Blackwell:

This is in response to your submission dated September 3, 2025, requesting Department of Army (DA), U.S. Army Corps of Engineers (USACE) re-evaluation of a previously issued jurisdictional determination for a 14.15-acre addition to the Greensboro Municipal Airport as depicted on the attached maps. The review area is located in Section 26, Township 20 North, Range 4 East, centered near latitude 32.683766 North, longitude -87.65941487 West in Greensboro, Hale County, Alabama. This project will continue to be evaluated under previously assigned file number SAM-2020-00339-JDC, which should be referenced in all future correspondence regarding this project.

Based on our desktop review of the information you provided and other publicly available mapping resources, we have determined the 14.15-acre parcel addition to Greensboro Municipal Airport consists of a non-jurisdictional dry land area that does not contain federally regulated wetlands or other waters of the United States (U.S.) and is not subject to our Federal permitting authority. You should note that this determination is primarily based upon the information submitted by you and/or your consultant, and that you are ultimately responsible for its accuracy.

The parcel was reviewed pursuant to Section 404 of the Clean Water Act, which requires that a DA permit be obtained for the placement or discharge of dredged and/or fill material into "waters of the United States", including wetlands, prior to conducting the work (33 U.S.C. 1344). For regulatory purposes, the USACE defines wetlands as

those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions.

This letter contains an approved jurisdictional determination (JD) for the subject parcel. If you object to this determination, you may request an administrative appeal under USACE Regulations at 33 CFR Part 331. Attached you will find a Notification of Appeal Process (NAP) fact sheet and Request for Appeal (RFA) form. If you request to appeal this determination you must submit a completed RFA form to the USACE, South Atlantic Division Office at the following address:

Acting Regulatory Review Officer
Attention: Ms. Jessica Comeaux
CESAD-PDS-O
60 Forsyth Street Southwest, Floor M9
Atlanta, Georgia 30303-8803
Jessica.C.Comeaux@usace.army.mil

In order for an RFA to be accepted by the USACE, the USACE must determine that it is complete, that it meets the criteria for appeal under 33 CFR Part 331.5, and that it has been received by the Division Office within 60 days of the date of the NAP. Should you decide to submit an RFA form, it must be received at the above address by **November 7, 2025**. It is not necessary to submit an RFA form to the Division Office if you do not object to the determination in this letter.

This approved JD is based on current policy and regulation and is valid for a period of five (5) years from the date of this letter. If by the end of the five-year period any proposed work has not been implemented and this JD has not been specifically revalidated by the USACE, it shall automatically expire.

The statements contained herein do not convey any property rights or any exclusive privileges, and do not authorize any injury to property nor shall it be construed as excusing you from compliance with other Federal, State, or local statutes, ordinances, or regulations that may affect proposed work at this site. Furthermore, the delineation included herein has been conducted to identify the location and extent of the aquatic resource boundaries and/or the jurisdictional status of aquatic resources for purposes of the Clean Water Act for the particular site identified in this request. This delineation and/or jurisdictional determination may not be valid for the Wetland Conservation Provisions of the Food Security Act of 1985, as amended. If you or your tenant are U.S. Department of Agriculture (USDA) program participants, or anticipate participation in USDA programs, you should discuss the applicability of an NRCS certified wetland determination with the local USDA service center, prior to starting work.

If you intend to sell property that is part of a project that requires DA authorization, it may be subject to the Interstate Land Sales Full Disclosure Act. The Property Report,

required by Housing and Urban Development Regulation, must state whether or not a permit for the development has been applied for, issued, or denied by the USACE, (Part 320.3(h) of Title 33 of the Code of Federal Regulations).

Based on our findings regarding the 14.15-acre parcel, a **DA permit pursuant to Section 404 of the Clean Water Act will not be required** to conduct work on the property. However, if the location or scope of work changes, the Greensboro Municipal Airport is urged to contact this office for a verification of this determination.

We appreciate your cooperation with the USACE Regulatory Program. Please refer to file number **SAM-2020-00339-JDC** in all future correspondence regarding this project. You may contact me at leslie.e.turney@usace.army.mil or at (205) 213-9623 if you have questions concerning this matter. For additional information about our Regulatory Program, visit our website at www.sam.usace.army.mil/Missions/Regulatory.aspx. Also, while you are there, please take a moment to complete our regulatory customer survey located along the right side of the webpage. Your responses are appreciated and will help us improve our services.

Sincerely,

Leslie E. Turney
Chief, North Branch
Regulatory Division

Attachments



ALABAMA HISTORICAL COMMISSION

468 South Perry Street
Montgomery, Alabama 36130-0900

Lisa D. Jones
Executive Director
State Historic Preservation Officer

Tel: 334-242-3184
Fax: 334-242-1083

September 11, 2025

Eric Tomasovic
FAA
10 Canebrake Blvd. Suite 100
Flowood, MS 39232

Re: AHC 25-1104
CRA
Greensboro Municipal Airport (7A0)- Airport Terminal Expansion
Hale County

Dear Mr. Tomasovic:

Upon review of the cultural resource assessment conducted for the above referenced project, we concur with the author's finding that project activities will have no effect on cultural resources eligible for or listed on the National Register of Historic Places. Therefore, we concur with the determination of No Effect to Historic Properties.

Consultation with the State Historic Preservation Office does not constitute consultation with Tribal Historic Preservation Offices, other Native American tribes, local governments, or the public. If archaeological materials are encountered during construction, the procedures codified at 36 CFR 800.13(b) will apply. Archaeological materials consist of any items, fifty years old or older, which were made or used by man. These items include but are not limited to, stone projectile points (arrowheads), ceramic sherds, bricks, worked wood, bone and stone, metal, and glass objects. The federal agency or the applicant receiving federal assistance should contact our office immediately. If human remains are encountered, the provisions of the Alabama Burial Act (*Code of Alabama* 1975, §13A-7-23.1, as amended; Alabama Historical Commission Administrative Code Chapter 460-X-10 Burials) should be followed. This stipulation shall be placed on the construction plans to ensure contractors are aware of it.

We appreciate your commitment to helping us preserve Alabama's historic archaeological and architectural resources. Should you have any questions, please contact Amanda McBride at 334.230.2692 or Amanda.McBride@ahc.alabama.gov. Have the AHC tracking number referenced above available and include it with any future correspondence.

Sincerely,

Lee Anne Hewett
Deputy State Historic Preservation Officer

LAH/amh

Appendix E

Date: July 9, 2026

To: Mr. Eric Tomasovic
Federal Aviation Administration
10 Canebrake Blvd., Suite 100
Flowood, MS 39232
Eric.tomasovic@faa.gov

From: Robert C. Walthall, General Partner
Walthalia Ltd. I
3522 Salisbury Rd.
Birmingham, AL 35213
rwalthall@joneswalker.com

Subject: Walthalia Ltd. I -- Formal Comment letter to the FAA Draft Environmental Assessment (Draft 5) (the "EA") for The Greensboro Municipal Airport Terminal Expansion (the "Terminal Expansion"), Including the Vacation of a Portion of the Airport Loop Road (the "Vacation")

Walthalia Ltd. I (the "Objector"), owns a 500 acre parcel of real property (the "Objector's Property") abutting on both the Eastside and Westside of the Greensboro Municipal Airport Loop Road (the "Loop Road"). The Objector submits this Comment Letter on the EA for the Terminal Expansion. The Objector owner is the Fifth Generation of the same family that has owned and operated the Objector's Property for various agricultural activities for the past One-Hundred years. During this One- Hundred Year Period, this Family has been engaged in cattle and row crop farming, dairying, timber operations, recreation and related business and family activities.

During the past five years, the City, and its paid consultant, Goodwyn Mills Cawood, LLC, have presented the Objector with various types of proposed plans of condemnation of portions of the Objector's Property, including: (i) an Eight Acre Parcel containing the Objector's Service Road along the southeast end of the Airport, (ii) a designated Tree and Fenceline area adjacent to the Service Road and (iii) the Fourteen Acre Parcel which is the proposed location of the Terminal Expansion. During this period of time, the Objector resisted the City's efforts to condemn the subject portions of the Objector's Property. Subsequently, the Objector agreed to sell the Fourteen Acre Parcel to the City, with the Objector's understanding from the City's representatives that (i) the Airport Expansion would not create or cause any disruption or interference with the Loop Road and the Property Owners abutting the Loop Road; and (ii) the City did not own the Loop Road.

The Objector submits the following major deficiencies in the EA, request the FAA reject the EA and require the City to revise the Terminal Expansion, to include a continuation of the Loop Road as a continuous public road to serve the community, its citizens and the Fifteen Property Owners abutting the Loop Road (the " Fifteen Property Owners"):

A. ALL FIFTEEN PROPERTY OWNERS ABUTTING THE LOOP ROAD, INCLUDING THE TEN PROPERTY OWNERS ABUTTING THE WESTSIDE OF THE LOOP ROAD, STRONGLY OBJECT TO AND OPPOSE THE PROPOSED LOOP ROAD VACATION -- TERMINAL EXPANSION, BECAUSE OF THE SOCIO -ECONOMIC IMPACT ON THE COMMUNITY, ITS CITIZENS AND THE FIFTEEN PROPERTY OWNERS.

The Terminal Expansion which includes Vacation of part of the Eastside of the Loop Road, includes new hangar construction, taxiway widening, relocation and expansion of Airport parking facilities, all of which will introduce severe, irreversible adverse socio- economic impacts on the Fifteen Property Owners, including heightened low-frequency noise pollution, structural vibration, light pollution and diminished air quality.

B. THE EA FAILS TO ANALYZE THE TRAFFIC DISRUPTION AND CREATION OF TWO DANGEROUS DEADEND ROADS RESULTING FROM THE VACATION AND TERMINAL EXPANSION.

The Draft EA completely fails to analyze the physical and logistical chaos the Vacation will cause to the Community, its citizens and the Fifteen Property Owners. For over fifty years, the Loop Road has served as a continuous, reliable access route for the community, including, specifically, the Fifteen Property Owners.

Vacating a portion of the Loop Road will split the Road into two dangerous -- separate Dead-end Roads. The Vacation provides NO turnaround or turning circles for these new Dead-end Roads.

The Vacation will directly disrupt the established access routes for the Fifteen Property Owners who rely on the Loop Road to converse to and from their homes, farms and related activities. The EA treats this major infrastructure change as minor, completely overlooking the compounding negative impact on these Fifteen Property Owners who have relied on this continuous Loop Road for half a century. The EA fails to adequately assess the severe economic, logistical and safety impacts that closing this Public Road will cause to the Fifteen Property Owners, their families and relates agricultural operations.

C. THE EA CONTAINS NO MUNICIPAL AVIATION PROJECTIONS TO JUSTIFY THE VACATION -- TERMINAL EXPANSION.

Despite these profound local consequences, the EA completely fails to comply with the National Environmental Policy Act and FAA Order 1050.1F. The EA relies on a fundamentally flawed premise concerning the purported Airport increased operations, air traffic and expansion: The EA contains NO municipal aviation projections, surveys, reports or other such findings to justify the Terminal Expansion or requirement of a Public Purpose -- Necessity for such undertaking by the City.

D. THE VACATION -- TERMINAL EXPANSION WILL CAUSE IMMEDIATE AND IRREPARABLE DEVALUATION OF THE FIFTEEN PROPERTY OWNERS PROPERTY.

Forcing these historic family farms and agricultural operations onto fragmented, dead-end roads will permanently reduce property utility and significant decreased market value of their property. The EA completely ignores these direct financial losses to the Property Owners and to the agricultural community as well.

E. THE EX FAILS TO EVALUATE REASONABLE ALTERNATIVES FOR APPROPRIATE AIRPORT DESIGN.

Under the National Environmental Policy Act (NEPA), the FAA must fully explore alternatives that cause the least amount of harm. The EA fails to properly evaluate alternative airport designs that would accomplish the expansion goals without destroying a fifty-year-old public access route. The FAA must re-examine the "No Action" alternative and look into reasonable and sound configurations that shift the runway or expansion zone away from the Loop Road.

F. THE EA CONTAINS FLAWED ENVIRONMENTAL AND SAFETY ASSESSEMENTS.

The Terminal Expansion will bring the Airport operations much closer to private properties. The EA does not properly measure the increase in noise pollution, dust, and runoff that will impact the Fifteen Property Owners, their homes, families and farm operations. Furthermore, the EA assessment lacks detailed safeguards regarding potential soil and water contamination from Airport runoff into agricultural lands and the surrounding local watershed.

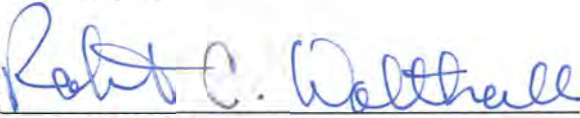
Conclusion and Requested Action

Because the Vacation and Terminal Expansion will cause significant, permanent hardships to the community, including the Fifteen Property Owners, disrupt vital family and farm operations, and create hazardous driving conditions, the FAA cannot legally issue a Finding of No Significant Impact (FONSI).

The FAA must require the City to revise the Vacation and Terminal Expansion to keep the Loop Road fully open as a continuous public road serving the community, its citizens and the Fifteen Property Owners. If the City refuses, the FAA must order a comprehensive Environmental Impact Statement (EIS) to fully evaluate these severe socio-economic impacts on the interested parties.

The Objector requests your careful consideration of these Comments and also request being added to the official notification list for all future public notices, meetings, and decisions by the FAA.

Respectfully Submitted,
Walthalia Ltd. I

By: 
Robert C. Walthall
General Partner

NICHOLAS H. COBBS, JR.
ATTORNEY AT LAW
1110 MAIN STREET
GREENSBORO, ALABAMA 36744
TELEPHONE 634-024-4202

July 11, 2026

E-Mail to: Mr. Eric Tomasovic
Eric.tomasovic@faa.gov

Re Environmental Assessment submitted by Goodwin Mills
Caywood on the proposed expansion of the Greensboro
Municipal Airport

Dear Mr. Tomasovic:

Please be advised that I am an attorney practicing law in Greensboro for the last fifty-six years and have been asked by several of the owners of land adjoining the Greensboro Municipal Airport, or who are adversely affected by the proposed closure of part of West Airport Loop Road, to speak on their behalf in opposition to the proposed closure.

I do not personally own any property affected by the proposed actions of the City of Greensboro Airport, but I represent the following persons affected by the action of the City of Greensboro:

Gayle Newton owns a substantial amount of land on the North, South and parts of the West side on both the North and South ends of the Greensboro Airport and also on the East side of East Airport Loop Road, and will, along with her tenants, suffer extreme inconvenience by the proposed closure of West Airport Loop Road.

Deane Poellnitz Cook and her husband, Phil Cook, own a one-half interest in the Tingley Place which joins the airport on its West side near the middle of the Airport, and Augusta Poellnitz Hassinger and her husband, David Hassinger, own the other one-half interest in the Tingley Place and collectively, they and their families have a fifty foot wide easement from West Airport Loop Road across the Airport just North of the runway, and a forty-five foot wide easement from West Airport Loop Road across the Airport just South of the runway. These rights of way were reserved when the City of Greensboro purchased the original Airport property in 1962, were conveyed to Richard Poellnitz, and provide the only legal access the Poellnitz family has to their Tingley property containing approximately 400 acres.

Michael Rylee and his daughter, Michelle Rylee McCrory, and her husband, Wade McCrory, own land from East Airport Loop Road to West Airport Loop Road. They live on the property and operate a land clearing and earth moving business and rely on access to their property from East Airport Loop Road and from West Airport Loop Road and will be adversely affected by any blockage of West Airport Loop Road. Recently the Rylee's granddaughter, Kailyn Clements, and her husband placed a mobile home and are living on the East side of West Airport Loop Road and access there property from West Airport Loop Road near the North end of the proposed closure.

The Environmental Assessment of the Greensboro Airport project prepared by Goodwin Mills Caywood, LLC, hereafter referred to as GMC, has several glaring omissions that I would like to point out.

First, the Environmental Assessment refers repeatedly to the failure of the present Greensboro Airport to comply with FAA guidelines in failing to have adequate runway/taxiway, runway/parking separation, but nowhere does it provide specific information on how the present Airport is in violation and what distances are specifically required by the FAA.

Second, GMC makes references to the City owning both sides of the West Airport Loop Road. The Environmental Assessment fails to mention that the Walthall property East of the West Airport Loop Road was recently acquired from Robert Walthall by threat of condemnation, and that he agreed to convey the property to the City only after the representative of GMC assured him that there was no plan for the City to close the West Airport Loop Road, a serious misrepresentation of fact. Charles Seale who is in charge of the Airport was telling people that the plan was for the City of Greensboro to purchase Airport Loop Road from the County and acquire acreage from Robert Walthall east of West Airport Loop Road, close the entire West Airport Loop Road and make a taxiway out of it and build hangars, parking and various supportive structures on the property the City had acquired from Walthall. In fact, I personally heard him announce that to the women working in the Hale County Probate Office when he was dealing with the County.

Third, The City undertook to obtain avigation easements from landowners to prevent structures, trees or anything else that might interfere with planes taking off or landing from the North end of the Airport, and began preliminary condemnation proceedings against Michael Rylee who owned land East of the West Airport Loop Road near the North end of the runway. Being aware of the plan of the City to close the entire West Airport Loop Road and make a taxiway out of most of it, I questioned the GMC representative closely about what I had heard about the City planning to close the West Airport Loop Road and make a taxiway out of it and was planning to build hangars, offices, and various structures on the property the City had acquired from Robert Walthall, and the City officials and GMC representative in that meeting vehemently denied that there was any plan to close any part of the West Airport Loop Road. Enclosed is a copy of the avigation easement that they were asking Michael Rylee to sign that contains a clause with Michael Rylee agreeing to close any adjoining roads which would have included West Airport Loop Road. I brought that to the attention of the GMC representative and in response the GMC representative said that that clause was not supposed to be in the easement they presented to Michael Rylee and it would be removed. Instead of removing the closure clause, the City dropped the avigation easement from Michael Rylee, and started working on Robert Walthall about his trees South of the runway, and in that process tried to get Robert to sell that part of the road south of West Airport Loop Road and when he told the GMC representative that he was not going to allow the City to close the road south of West Airport Loop Road they dropped that avigation easement and moved into the current effort by GMC to close the West Airport Loop Road in the location of the hangars, to give access for airplanes to taxi across West Loop Road. The City is taking the position that since the City purchased the right of way for the West Airport Loop Road from Hale County, the City of Greensboro can close the road without asking anybody. I think GMC found out that public road closure law had been changed and in the event of any closure, the owners on each side would get one-half of the road, and that would not accomplish their plan to close down West Airport Loop Road.

Fourth, GMC in their Environmental Assessment presented to FAA, makes numerous references to the necessity for closing West Airport Loop Road to meet the future need for air travel in Greensboro. Nowhere do they mention that for several years now, there have only been three airplanes parked at the Greensboro Airport, and at least two of those are owned by individuals who cannot pass a physical to fly an airplane, and there is no justification for spending enormous sums of money to accommodate three or four people. At one time when the Airport was new, there were thirty to fifty planes parked at the Greensboro

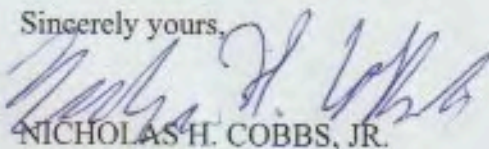
Airport. My question is whether FAA regulations have changed so much that an airport could accommodate thirty to fifty planes in the 1970s and 1980s, but needs to expand the airport to accommodate three planes in 2026.

Finally, I would like to point out that the Environment Assessment occupies a substantial number of its 128 pages to dealing with the absence of the Tricolored Bat, Alligator Snapping Turtle, Inflated Heelsplitter (whatever that is), Monarch Butterfly, the absence of wetlands, effect on wildlife, absence of historical structures or places, water quality, airplane noise, and numerous other issues, but there is not one mention of the fact that the closure will affect just about everybody living on West Airport Loop Road, East Airport Loop Road, that part of the Millwood Road near the Airport, and living on or owning land anywhere close to the Airport and in many cases will have a negative effect on the value of their property.

Ironically, after spending pages trying to justify spending over a million and a quarter dollars to prepare for a drastic increase in air traffic expected at the Greensboro Airport, when it came to justifying no pollutants, the document admits that **"a significant increase in airport operations is not anticipated as a result of the implementation of the proposed action."**

I would respectfully submit that if the City of Greensboro cannot find an alternative that will allow West Airport Loop Road to remain open to the public, that this project be abandoned.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Nicholas H. Cobbs, Jr.", is written over the typed name.

NICHOLAS H. COBBS, JR.

ATTACHMENT

**OFFER OF SALE OF LAND
(OPTION)**

In consideration of the sum of one dollar (\$1.00) and other valuable consideration in hand paid, the receipt whereof is hereby acknowledged, the undersigned **MICHAEL R. RYLEE**, a (hereinafter called the "Seller"), being the owner thereof, hereby offers and agrees to sell and convey to **CITY OF GREENSBORO** (hereinafter called the "Purchaser") or its assign or nominee, an avigation easement, located in Section 23, Township 20 North, Range 4 East, Hale County, Alabama, and under the following terms and conditions:

BEGIN AT A FOUND BOLT LYING AT THE INTERSECTION OF THE EAST RIGHT OF WAY OF AIRPORT LOOP ROAD WITH THE NORTHWEST CORNER OF THAT CERTAIN PARCEL OF LAND AS CONVEYED TO MICHAEL R. RYLEE AND RECORDED IN THE OFFICE OF THE JUDGE OF PROBATE OF MONTGOMERY COUNTY, ALABAMA, IN DEED BOOK A142 AT PAGE 940; THENCE RUN ALONG THE NORTH LINE OF SAID PARCEL, S 89°03'42" E, 34.22 FEET, MORE OR LESS, TO A POINT OF INTERSECTION WITH THE EAST LINE OF A PROPOSED AVIGATION EASEMENT; THENCE LEAVE SAID NORTH LINE AND RUN ALONG SAID EAST LINE, S 08°47'09" W, 302.17 FEET, MORE OR LESS, TO A POINT OF INTERSECTION WITH THE AFOREMENTIONED EAST RIGHT OF WAY; THENCE RUN ALONG SAID RIGHT OF WAY, N 02°17'04" E, 299.42 FEET, MORE OR LESS, TO THE POINT OF BEGINNING. SAID DESCRIBED PROPERTY LYING AND BEING SITUATED IN THE SOUTHWEST QUARTER OF SECTION 23, T-20-N, R-4-E, HALE COUNTY, ALABAMA, AND CONTAINS 0.117 ACRES (5122 S.F.), MORE OR LESS.

The Purchaser is the owner and operator of the **GREENSBORO MUNICIPAL AIRPORT** ("AIRPORT"), situated in Hale County, Alabama, and in close proximity to property owned by the Seller and desires to obtain and preserve for the use and benefit of the public a right of free and unobstructed flight for aircraft landing upon, taking off from, or maneuvering about the airport.

Upon closing, the Seller shall convey to the Purchaser, or its assignee or nominee, by Avigation Easement, a good and marketable title thereto, together with all improvements, hereditaments, and appurtenances thereunto belonging, free and clear of all liens (except liens for current taxes and assessments), easements, restrictions, delinquent taxes and assessments, leases and encumbrances of any kind, existing or inchoate with proper release of dower, curtesy and waiver of homestead rights, if any, together with all right, title and interest in and to any streets or alleys adjoining or abutting thereon. Taxes and assessments shall be adjusted as of the time of closing. Possession shall be delivered to the Purchaser at the date of closing, or 90 days from the date of written notice, for surrendering possession, given in accordance with the requirements of the Uniform Act (PL-91-646), As Amended.

The total purchase price shall be **\$2,200.00**. All expenses of examination of title and of preparation of recording of the deed shall be paid by City of Greensboro, Alabama. Payment of the purchase price shall be made upon execution of avigation easement to the Purchaser.

This offer shall be Irrevocable for a period of 180 days from the date hereof and shall remain in force thereafter until terminated by the Seller. Such termination may be effected at any time after expiration of such 180 day period by Seller, giving 60 days prior written notice to the Purchaser of such termination. If this offer is accepted, the Purchaser shall endorse its acceptance hereof and mail notice thereof to the Seller at the address specified below. The Purchaser shall specify the place and time of

closing, which shall not be more than 180 days after the date of acceptance. The Seller agrees that this offer shall not be revocable and that he/she will not sell, mortgage, encumber or otherwise dispose of such property or any part thereof prior to said expiration date, except to the Purchaser. This agreement shall be binding upon the Seller and his/her heirs, executors, administrators, successors and assignees.

Loss or damage to the property by fire or casualty shall be at the risk of the Seller until title has been conveyed to the Purchaser.

IN WITNESS WHEREOF, we have set our hands and seals on the day the same bears date.

WITNESS:

SELLER:

MICHAEL R. RYLEE

Date _____

By (print name) _____

Its _____

Date _____

WITNESS:

PURCHASER:

CITY OF GREENSBORO

Date _____

By (print name) Johnnie B. Washington

Its Mayor

Date _____

Two Comments received regarding socioeconomic impacts.

Response to Comments:

Revisions were made to Section 5.7.1(d), including changing the finding from "no impact" to "no significant social impacts are anticipated as a result of implementing the proposed alternative." The remaining comments were not substantive to the Environmental Assessment and did not call for additional revisions to the document. However, all comments were forwarded to the Mayor of Greensboro, Alabama, who serves as the responsible official for the Greensboro Municipal Airport.